SUMMARY OF HWMU CLOSURE ACTIVITIES ROTH BROS. SMELTING CORP. EAST SYRACUSE, NEW YORK

by ·

H&A of New York Rochester, New York

for

Roth Bros. Smelting Corp. East Syracuse, New York

File No. 70185-45 October 1992



## H&A OF NEW YORK



Geotechnical Engineers & Environmental Consultants

28 October 1992 File No. 70185-45

New York State Department of Environmental Conservation Bureau of Eastern Region Hazardous Wastes Division of Hazardous Substances Regulation 50 Wolf Road Albany, New York 12233-7252

Attention:

John Middelkoop, Director

Subject:

Summary of HWMU Closure Activities

Roth Bros. Smelting Corp. East Syracuse, New York

#### Gentlemen:

This report describes closure activities recently completed on three hazardous waste storage areas at the Roth Bros. Smelting Corp. in East Syracuse, New York. Closure activities were conducted in accordance with the approved closure plan in Roth's Part 373 permit (USEPA I.D. No. NYD006977086) dated October 1986. An extension for submittal was approved following a 29 September telephone conversation with Mr. Thomas John (NYSDEC) and Mr. Robert Harvey, (NHDD-counsel to Roth Bros.). A second extension for submittal of the closure certification (included in this report) to 30 October 1992 was granted by Mr. Thomas John on 13 October 1992, per telephone communication with Elizabeth Henderson of H&A of New York.

H&A of New York personnel were present on site to observe activities associated with the storage area cleaning and to perform sampling of the walls and floors in each closure area before and after cleaning activities.

A description of the closure activities conducted at the three hazardous waste storage areas on Plants 1 and 2 is presented below. Information is presented and closure activities are described in the same order as described by the Approved Roth Bros. Part 373 Permit Closure Plan (Appendix A). In summary, remaining waste inventory was removed from the storage areas and shipped to an approved disposal facility; samples were taken before initiation of cleaning; storage area cleaning was performed as described in the closure plan; and confirmation samples were taken after cleaning to document the efficiency of cleaning. Sample results indicate closure in

189 North Water Street Rochester, NY 14604 '716/232-7386

Affiliate
Haley & Aldrich, Inc.
Cambridge, Massachusetts
Clastonbury, Connecticut
Scarborough, Maine
Bodford, New Hampshire
FOIL 205582

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conformance with the closure plan has been completed for the Plant 1 storage area, the northern Plant 2 storage area, and one-half of the southern Plant 2 storage area. Residual lead concentrations above TCLP criteria in storage area floor samples prevent confirmation of closure at this time of the remaining one-half of the southern area. Recommendations for re-opening adequately closed areas for <90 day storage and resolution of the lead residues in the remaining one-half area are presented at the conclusion of this report.

#### STORAGE AREA LOCATIONS AND DESCRIPTION

Three hazardous waste storage areas (Hazardous Waste Management Units - HWMUs) were operated at the Roth Bros. site, as shown on Figure 1. The Plant 1 HWMU storage area consists of one enclosed room with a concrete floor and metal walls (Figure 2). Hazardous wastes stored in the Plant 1 storage area, prior to closure activities, were aluminum baghouse dusts designated as D006 and D008 wastes.

The Plant 2 designated HWMU storage areas are located on the west side of Plant 2, and consist of three covered rooms, as shown on Figure 2. For purposes of discussion, these rooms have been designated as copper dust storage areas A and B and the lead dust storage. Areas A and B are three sided, with an open side to the east, and constitute the northern storage area of the two Plant 2 HWMUs. The lead dust storage area is open on the east and south sides and constitutes the southern storage area of the two Plant 2 HWMUs. D006 and D008 wastes were stored in areas A and B prior to closure activities. Waste designated as K069 baghouse dust was stored in the Plant 2 lead storage unit prior to closure activities.

The Plant 2 HWMU areas shown in the Closure Plan (Appendix A) indicates the presence of a crusher baghouse on the southeast corner of the present northern storage area. The baghouse operated from 1977 to 1987. In 1987, it was destroyed by fire, which was reportedly contained within the baghouse. The former baghouse managed copper and aluminum dust containing cadmium and lead (D006, D008). The area was then used for storage of the lead baghouse dusts.

The three bays where the former baghouse was located were renovated about 1989. The asphalt was removed and replaced with about an  $8\pm$  in. poured concrete floor.

Confirmation sampling performed during closure included analyses for the above wastes (Total lead and cadmium, and TCLP analyses). PCBs were not routinely handled by Roth Bros. However, recent testing of baghouse dusts has shown the presence of PCBs. Therefore, PCBs were included in the sampling and analyses plan to determine their presence following cleaning activities.

#### INVENTORY REDUCTION

Hazardous materials were routinely collected directly from baghouse operations and stored in 43-cu. ft. triple corrugated boxes (Gaylord boxes) lined with 4 ml. polyethylene bags. Once full, the bag is closed and tied off with wire and covered with another 4 ml. polyethylene bag and a secure cover. Final shipment of the wastes stored in the Plant 1 and 2 storage areas to the



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Chemical Waste Management Emelle Facility in Alabama, occurred over the time period 21 September to 3 October 1992. Manifests documenting the shipments of remaining wastes from the storage areas are provided in Appendix B.

## **FACILITY DECONTAMINATION**

Facility decontamination was conducted by Action Cleaners of Syracuse, New York, on 5, 6 and 15 October 1992. Pre-cleaning activities, consisting of removal of inventory and an initial dry sweep, was performed by Roth Bros, personnel prior to the decontamination activities by Action Cleaners. The dry dusts collected were contained in the Gaylord boxes for offsite disposal. H&A of New York personnel monitored closure decontamination activities performed by Action Cleaners. A copy of H&A's Daily Field Reports describing each day's closure activities is included in Appendix C. In summary, decontamination consisted of spraying each room with a multi-purpose biodegradable industrial detergent, steam cleaning the walls and floors of each storage unit, and scrubbing with brushes. The ceiling in Plant 1 was also cleaned by the abovedescribed method. Floors were cleaned using a power sprayer and brooms. Water was vacuumed and collected in 55-gal. drums for off-site disposal. Solid materials were shoveled into drums for off-site disposal. Please note that the approved Part 373 permit closure plan required only dry sweeping and vacuuming of the storage areas for closure. Observations of the storage areas prior to decontamination indicated collected dust may be too caked on to be adequately removed by a totally dry process. Therefore, pressure washing and scrubbing were used in the cleaning process.

## **SAMPLING ACTIVITIES**

## Precleaning Sampling

H&A of New York personnel collected nine precleaning wipe samples on 5 October 1992 to use as a basis for evaluating the efficiency of the cleaning operations conducted. Wipe samples C1 - C9 were collected from selected locations on the walls and floors of the hazardous waste storage units (see Figure 2). Upstate Laboratories provided the jars, filter paper and hexane for wipe samples, which were collected using a 100 square centimeter area template to standardize sample collection. The nine precleaning samples were submitted to Upstate Laboratory in East Syracuse for analyses for PCBs, total lead and total cadmium. A summary of the results is presented below in the "Analytical Laboratory Results" section.

#### Confirmation Sampling

H&A of New York personnel collected six (6) confirmation wipe samples in Plant 1 and eighteen (18) confirmation wipe samples in Plant 2, following completion of the cleaning activities described above. Wipe samples were collected from the walls and the floors and submitted to Upstate for PCBs, total lead and total cadmium. The locations of the nine precleaning wipe samples were resampled to provide confirmation of the efficiency of the cleaning operations. In addition, thirteen more sample areas from the walls and floors were also collected to evaluate the consistency of cleaning activities.



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Composite concrete core samples, consisting of two or three cores from an area per sample, were also collected from the floor of the storage units and submitted for TCLP lead and TCLP cadmium. A concrete coring machine was used to collect floor slab cores to depths of approximately 1.0 to 1.5 in. from the surface of the slab. Core depths were limited so that the composite represented mostly surface material. Two (2) composite concrete core samples were collected on Plant 1 and eight (8) composite core samples were collected on Plant 2 on 6 October. Confirmation TCLP lead results in two bays in the lead storage area were above regulatory criterion therefore, additional cleaning and core sampling were performed. Five additional core samples were collected and submitted for TCLP lead analyses on 15 October.

Sampling locations for Plants 1 and 2 HWMUs are shown on Figure 2. A summary of the analytical results is presented below.

### ANALYTICAL SAMPLING RESULTS

Laboratory analytical results for the precleaning and confirmation wipe samples are summarized on Table I and discussed below. Wipe samples were analyzed for PCBs, total lead and total cadmium based on the materials which were stored in the two areas. Results of the composite core sample analyses (for TCLP lead and TCLP cadmium) are summarized on Table II and discussed below. Laboratory analytical data is provided in Appendix D.

## Target Cleanup Criteria

Cleanup criteria set for the HWMU closure at this site are as follows:

- The wall and floor surfaces are to be visibly free of dusts.
- For core samples collected from the floor, the sample must fall below TCLP regulatory levels of 1.0 mg/l for cadmium and 5.0 mg/l for lead.
- For PCB wipe samples from the floors and walls, the target cleanup standard is 10 ug/100 cm<sup>2</sup>, as per the 40 CFR Part 761.125 Spill Cleanup Policy for secure industrial surfaces and contact surfaces of metal parts/equipment.

#### Precleaning and Confirmation Wipe Sampling - Plant 1

PCBs - PCBs were not detected above laboratory detection limits in either the precleaning or confirmation samples. A trip-wipe sample accompanied the cooler containing the confirmation wipes from Plant 1. The trip-wipe was provided by the laboratory, accompanied the sampling jars to the site and back to the laboratory. PCBs were detected in the trip-wipe at 0.7 ug/wipe. No PCBs were detected in the confirmation results, indicating possible contamination of the trip-wipe prior to shipment to the site or during the laboratory analyses.



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Cadmium - Cadmium was detected in a floor precleaning sample C-2 at 0.0036 mg/wipe. However, cadmium was not detected in the confirmation sample C-106 at the same location. Cadmium was not detected in any of the other confirmation wipe samples in the Plant 1 closure area.

Lead - Lead was detected in one floor precleaning sample (C-2) at 0.11 mg/wipe. The confirmation sample at this same location had a lead detection at 0.02 mg/wipe, just above the detection level of 0.01 mg/wipe. Confirmation sampling at other wipe locations for lead ranged from 0.01 to 0.02 mg/wipe.

## Precleaning and Confirmation Wipe Sampling - Plant 2, Copper Storage

PCBs - Precleaning concentrations of PCBs in Areas A and B (copper storage) ranged from nondetect to 2.4 ug/wipe in the seven wipe samples collected. Five confirmation wipe samples indicated no PCBs were detected; four confirmation wipe samples detected PCBs ranging from 0.5 to 2.2 ug/wipe, well below the target cleanup standard of 10 ug/wipe.

Cadmium - Precleaning wipe samples for cadmium had concentrations ranging from nondetect to 0.014 mg/wipe. Confirmation wipe analyses results indicate cadmium at concentrations ranging from nondetect to 0.009 mg/wipe.

Total Lead - Precleaning results for lead in Areas A and B ranged from 0.07 to 2.7 mg/wipe. Nine confirmation wipe samples analyses ranged from 0.04 to 1.1 mg/wipe.

### Core Sampling - Plant 1

Two composite core samples (C-101, C-102) were collected from the Plant 1 HWMU storage area. Each composite consisted of three cores, designated with an A, B or C after each sample number (i.e. C-101A, C-101B and C-101C make up sample C-101; see Figure 1). Analytical results indicate the TCLP cadmium was 0.022 and 0.2 mg/l, well below the 1.0 mg/l regulatory threshold. TCLP lead was non-detect and 0.3 mg/l in the two core samples, again below the 5.0 mg/l regulatory level.

## Core Sampling - Plant 2 Copper Storage

Three composite core samples (C-108, C-112, C-113) were collected from the copper storage HWMU (one from area A and two from area B) and analyzed for TCLP Cadmium and lead. Each composite consisted of three cores and are designated with an A, B or C after sample number (i.e. C-108A, C-108B and C-108C make up sample C-108). Cadmium results ranged from 0.008 to 0.090 mg/l, below the regulatory limit of 1.0 mg/l. Lead was detected at concentrations ranging from 0.7 to 3.1 mg/l, below the 5.0 mg/l regulatory limit.



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## Core Sampling - Plant 2 Lead Storage

Five composite core samples (C-117 through C-121) were collected on 6 October from the lead storage area. Each composite was made up from two cores (i.e. C-117A and C-117B) from each storage bay. Results indicate cadmium (TCLP) concentrations ranged from non-detect in three samples to 0.099 mg/l, below the regulatory limit.

Four of the five TCLP lead samples were detected at concentrations ranging from 0.3 to 4.4 mg/l, below the 5.0 mg/l standard. One sample (C-120) was detected at 13.0 mg/l for TCLP lead, in exceedance of the regulatory limit. C-120 was collected from the second bay from the west side of the storage area (see Figure 2).

Given the high results in C-120 and a result of 4.4 mg/l close to the 5.0 mg/l standard in C-121, the two western most bays were re-cleaned by Action Cleaners on 15 October 1992 (see Figure 2). Five additional composite core samples (C-127 through C-131) were collected from the upper 1 in. of asphalt and the samples were again analyzed for TCLP lead. Analytical results indicate the presence of lead at concentrations ranging from 3.6 mg/l to 42 mg/l. Three samples (C-127, C-128 and C-130) of the five exceeded the regulatory criteria for TCLP lead.

### **DISCUSSION**

Closure activities for the three HWMU storage areas were performed on 5, 6 and 15 October 1992. Observations of the three storage areas indicate they were free of visible dust following the cleaning activities. Photographic documentation of each area before and after the cleaning is provided in Appendix E.

Laboratory analytical results indicate the target cleanup goals were met for the Plant 1 HWMU storage area, the Plant 2 copper dust HWMU storage area (consisting of 2 three-sided bays) and the eastern portion of the lead dust HWMU storage area. H&A of New York considers these areas to have met the criteria for closure. No further action appears necessary. We recommend these areas be re-opened for short term (less than 90 days) storage of the baghouse dusts.

Asphalt cores from the western two bays of the lead dust storage area had concentrations of TCLP lead above the regulatory limit of 5.0 ppm. Based upon recent discussions with Roth Bros. personnel, the two western bays were paved with asphalt in 1962 and an additional 1± in. top coat of asphalt was put on in 1984. There was no visible difference between the two layers, as observed in the core sample holes.

We recommend additional detailed profile sampling be performed to establish the locations and depths of the lead concentrations within the asphalt. Upon the receipt of the results, measures will be developed to finalize the closure of these two bays. H&A will summarize these remaining activities and provide certification of closure upon completion.



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## SCHEDULE AND CLOSING

H&A will prepare and implement a detailed sampling plan to address the remaining area to be closed. We anticipate performing the sampling within the next two weeks. Following receipt of results we will evaluate appropriate additional closure measures that may be required for the remaining one-half of the Plant 2 lead storage area.

Please do not hesitate to contact us if you have any questions.

Sincerely yours, H&A OF NEW YORK

Elizabeth D. Henderson Senior Env. Geologist

Funabeth Ottenders

Vincent B. Dick Senior Env. Geologist

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#### Attachments:

Table I - Laboratory Analytical Results - Wipe Samples

Table II - Laboratory Analytical Results - Core Samples

Figure 1 - Hazardous Waste Management Unit Location Plan

Figure 2 - Sample Location Plan - Plants 1 and 2

Appendix A - Closure Plan

Appendix B - Hazardous Waste Manifests

Appendix C - Daily Field Reports

Appendix D - Laboratory Analytical Results

Appendix E - Photographic Documentation



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## **CERTIFICATION**

H&A of New York observed performance of closure activities at the Roth Bros. Plant 1 and Plant 2 HWMU-storage areas during the period 5-7 and 15 October 1992. Activities as described in the approved Part 373 Permit Closure Plan (dated October 1986) for these units were performed and supplemented as described in this report. H&A of New York states that the closure for the hazardous waste storage unit on Plant 1, the copper storage area on Plant 2 and one half of the lead storage area on Plant 2 have been performed in accordance with the approved closure plan.

I state that I have personally examined and am familiar with the information in this Report. Based upon our knowledge and inquiry of those individuals responsible for obtaining the information presented, the foregoing information is true, accurate and complete based upon the scope of work performed.



Lawrence P. Smith, P.E. Partner



Tables

## TABLE I LABORATORY ANALYTICAL RESULTS- WIPE SAMPLES ROTH BROS. HWMU CLOSURE

SAMPLE	LOCATION PCBs (ug/wipe) TOTAL CADMIUM (mg/wip		IIUM (mg/wlpe)	TOTAL LEAD (mg/wipe)			
NO.		PRECLEAN	CONFIRM.	PRECLEAN	CONFIRM.	PRECLEAN	CONFIRM.
PLANT 1							•
C-1/C-101	WALL .	<0.1	<0.1	<.0005	<.0005	<.01	0.02
C-103	WALL	NA	<0.1	NA	<.0005	NA	0.01
C-104	WALL	NA	<0.1	NA	<.0005	NA	0.02
C-105	WALL	NA NA	<0.1	NA NA	<.0005	NA	0.02
C-2/C-106	FLOOR	<0.1	<0.1	0.0036	<.0005	0.11	0.02
C-107	WALL	NA	<0.1	NA	<.0005	NA	0.02
TRIP WIPE	. <b></b>	NA	0.7	NA	<.0005	NA	0.01
PLANT 2	COPPER HWMU						
C-108	FLOOR	NA	1.0	NA	0.0031	NA	0.26
C-3/C-109	WALL	2.4	0.5	0.014	0.0011	2.7	0.36
C-110	WALL	NA	2.2	NA	0.009	NA	0.08
C-111	WALL	NA	<0.1	NA	0.0011	NA	0.04
DI ANIT O	COPPER HWMU						
PLANT 2		Į Į		Į l		Į Į	
C-112	AREA B FLOOR	NA	0.5	NA I	0.0052	NA	0.64
C-4/C-113	FLOOR	1.8	<0.1	0.0097	0.0052	1.4	1.1
C-5/C-114	WALL	<0.1	<0.1	<.0005	0.0059	0.07	0.06
C-115	WALL	NA NA	<0.1	V.0005	<0.0005	NA	0.00
C-116	WALL	NA	<0.1	NA NA	0.0018	NA ]	0.09
			·		, -		
PLANT 2	LEAD HWMU						•
C-6/C-118	FLOOR	0.8	0.11	0.0080	0.011	1.3	1.4
C-7/C-120	FLOOR	1.1	<0.1	0.053	0.0083	6.1	1.3
C-8/C-122	WALL	<0.1	<0.1	0.0085	0.0024	2.4	0.24
C-123	WALL	NA	<0.1	NA	0.0019	NA	0.16
C-124	WALL	NA	<0.1	NA.	0.0015	NA NA	0.06
C-9/C-125	WALL.	<0.1	<0.1	0.0064	0.0028	1.3	0.31
C-126	WALL	NA	<0.1	NA	0.014	NA	1.3
TRIP WIPE		NA	· <0.1	NA NA	0.0009	NA	<0.01

#### Notes

- 1. NA = No preciean sample taken for analysis.
- Samples were collected on 5 and 6 October 1992 by H&A of New York personnel. Analyses were performed by Upstate Laboratories. Analytical reports are provided in Appendix C.
- 3. Trip wipe samples were analyzed for each day of sampling.
- 4. Precleaning samples were collected from selected locations in each HWMU closure area prior to Initiation of cleaning activities.
- Confirmation wipe samples were collected in the same location as the precleaning samples as
  a measure of the efficiency of the cleaning, and at additional locations to evaluate consistency of closure results.

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# TABLE II LABORATORY ANALYTICAL RESULTS- CORE SAMPLES ROTH BROS. HWMU CLOSURE

SAMPLE	LOCATION	TCLP	TÇLP
NO.		CADMIUM	LEAD
PLANT 1			
C-101		0.022	<.01
C-102		0.02	0.3
PLANT 2	COPPER STORAGE		
C-108	AREA A	0.090	3.1
C-112	COPPER STORAGE	0.008	0.7
C-113	AREA B	0.057	2.4
•			
C-117	LEAD STORAGE	<.005	0.5
C-118	AREA	<.005	0.3
C-119		<.005	0.3
C-120		0.099	13.0
C-121		0.086	4.4
C-127		NA	18.0
C-128		NA	23.0°
C-129		NA	3.6
C-130		NA -	42.0
C-131		NA	4.0

#### Notes:

- 1. TCLP Toxicity Characteristic Leaching Procedure
- 2. Core samples are composite samples of two to three core locations within an area. See report text for core sampling and composite desription.
- 3. Core samples were obtained using a concrete coring machine, on 6 October 1992 and 15 October 1992.
- 4. "NA" Not Available, samples were not analyzed for this parameter.
- 5. TCLP Regulatory levels are 5.0 mg/l for lead and 1.0 mg/l for cadmium.
- 6. Results expressed in mg/l.

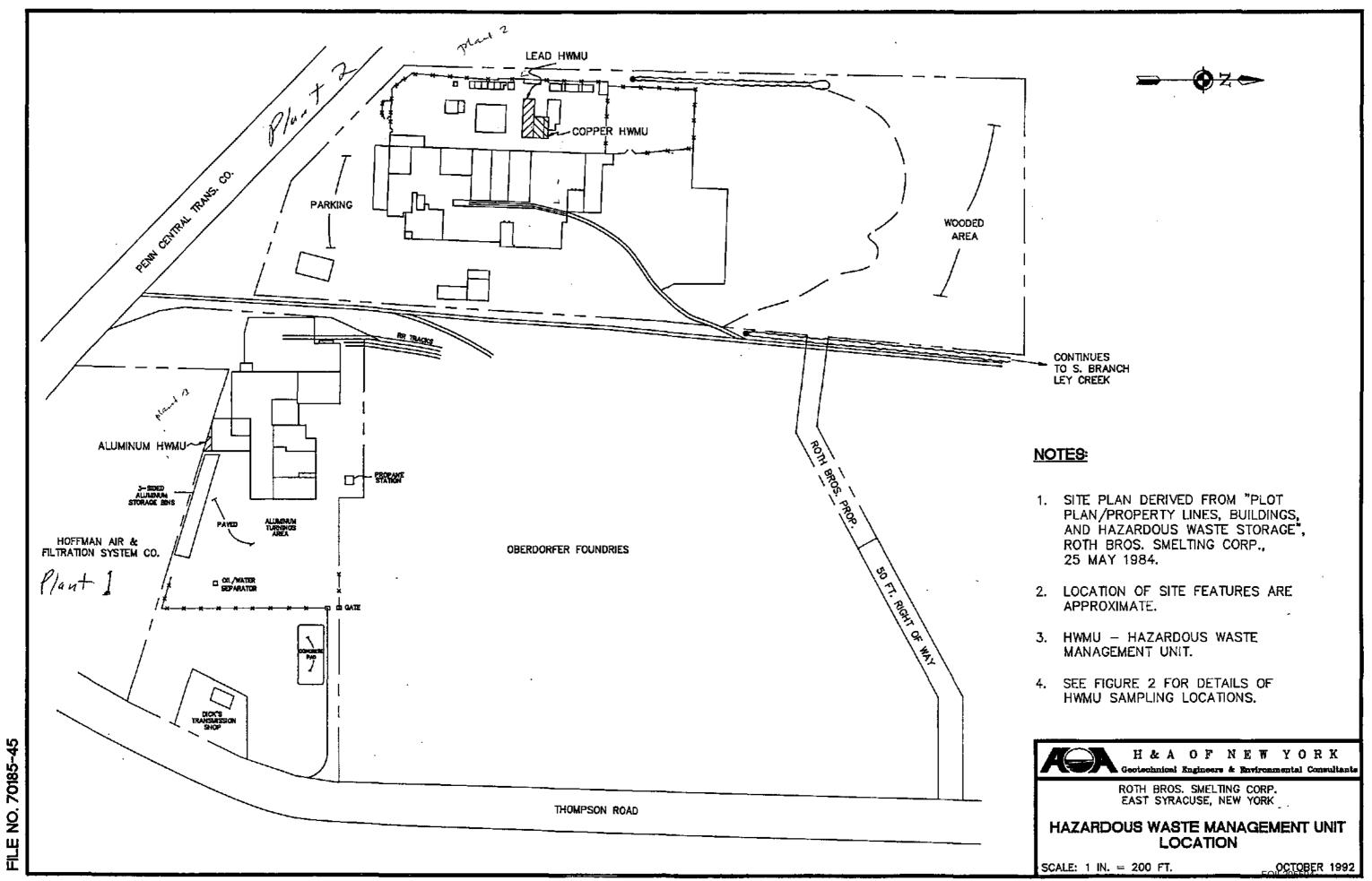
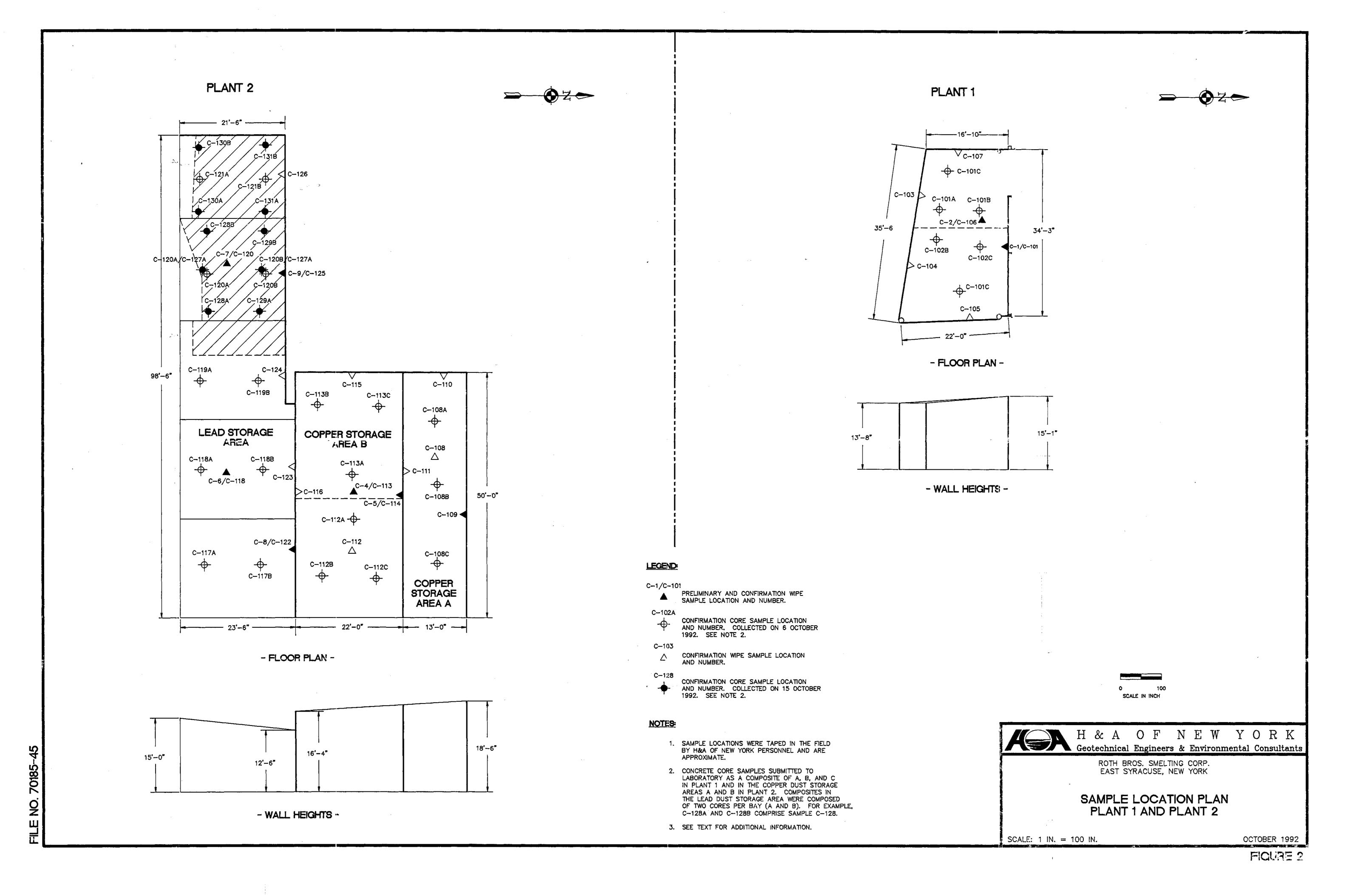


FIGURE 1



## APPENDIX A

Closure Plan



Roth Brothers Smelting Corporation 6223 Thompson East Syracuse, NY

EPA I.D. No. NYD006977986

6NYCRR PART 373 PERMIT ATTACHMENT V CLOSURE PLAN

## SECTION 4

## **CLOSURE**

## 4.01 Closure Plan and Cost Estimate

Closure of Roth Bros.' hazardous waste storage facility will consist of removal of all hazardous wastes and waste residues, and decontamination of equipment. A detailed Closure Plan including the required closure cost estimate is provided in Appendix H. In the event that Roth Bros. undertake partial closure (e.g. close one or two of the three hazardous waste storage areas), it would be conducted in accordance with the procedures described in the full Closure Plan. The cost would be an appropriate fraction of the total cost.

## 4.02 Financial Assurance Mechanism

Roth Bros. Smelting Corp. has established financial assurance for closure of the facility in accordance with option (3) of 6 NYCRR 373-2.8(d); they have obtained an irrevocable standby letter of credit. This letter is included in Appendix I.

## 4.03 Liability Coverage

Documentation of Roth Bros.' liability coverage in accordance with 6 NYCRR 373-2.8(h) is included in Appendix J.

PLAN AND COST ESTIMATE

FOR CLOSURE OF

HAZARDOUS WASTE STORAGE AREAS

ΑT

ROTH BROS. SMELTING CORP.

Thompson Road

East Syracuse, New York 13057

USEPA ID NO. NYD006977086

(Revised as of September, 1986)

## I. INTRODUCTION

Pursuant to regulations promulgated under authority of the Environmental Conservation Law of New York State in 6 NYCRR 373-2.7, Roth Bros. Smelting Corp. (Roth Bros.), as a Hazardous Waste Storage Facility, is required to maintain a Closure Plan and cost estimate for closure of the facility. The following sections describe the Closure Plan for this facility (USEPA ID No. NYD006977086). Partial closure of Roth Bros. facility, if conducted, would also follow the procedures in this plan.

## II. FACILITY DESCRIPTION

Roth Bros. Smelting Corp. is engaged in the business of reclaiming non-ferrous metals and alloys through secondary smelting and refining of purchased scrap, drosses, and by-products. Their primary materials and products are lead-tin solder, copper, zinc, aluminum, and Zamac (zinc-aluminum alloy).

Roth Bros. facility occupies about 35 acres in Onondaga County, New York, (Figure 1). Within the facility there are three designated hazardous waste storage areas. Areas where hazardous waste is generated, handled or stored are shown on Figures 2 and 3.

Currently, the following hazardous wastes are stored at Roth Bros.;

- 1. Aluminum Dust an air pollution dust from aluminum furnaces -USEPA Codes D006, D008.
- 2. Copper Dust an air pollution dust from the copper rotary furnace USEPA Codes D006, D008.
- Lead Dust an air pollution dust from secondary lead smelting -USEPA Codes K069.
- Crusher Dust an air pollution dust from aluminum crushing operation -USEPA Codes D006, D008.
- 5. Electroplating Sludge a sludge generated from the treatment of electroplating wastewater USEPA Code F006.
- Lead Slag slag generated from recycling of the electroplating sludge - USEPA Code F006.

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Except electroplating sludge, which is stored in 55 gallon steel drums, all hazardous wastes are stored in 43 cu. ft. triple corrugated boxes (Gaylord boxes) lined with 4 mil polyethylene bags. When the bags are filled, they are closed and tied off with wire, and another 4 mil poly bag is placed over the top of the box as a secure cover. The boxes are strapped to wooden pallets and moved to the designated storage area with a forklift. This procedure minimizes or eliminates threats to human health and the environment.

All of the storage areas are asphalt paved and protected from the elements by side walls and a metal deck roof. Also, the outdoor storage areas are sloped from back to front to prevent run-on. Sufficient aisle space is available for inspection by personnel.

A daily inventory of all hazardous wastes that are generated on the site is recorded and maintained on a master inventory kept by the Company Secretary. A 3 part numbering system is used on each box to document shipments to an approved Hazardous Waste Disposal Facility. Currently, lead dust (KO69) is being shipped to England for reclamation. Electroplating sludge is being reclaimed on-site in the lead furnace. All other hazardous wastes are being shipped to Fondessy Enterprises, Inc. in Oregon, Ohio (EPA No. OHDO45243706).

The maximum inventory of hazardous wastes which can be stored on site is 290 boxes.

## III. REMOVAL OF INVENTORY AND FACILITY DECONTAMINATION

At this time, closure of the Facility is not anticipated, but an estimated closure date of June 30, 2036 has been chosen. All hazardous materials stored in Gaylord boxes at the time of closure (maximum 290 boxes) will be shipped to an authorized hazardous waste management facility.

A schedule for completion of closure is provided as Table 1. Since all of the storage areas are paved, the first stage of decontamination will be to clean the area with a power sweeper. The storage areas will then be covered with a sweeping/cleaning compound and again cleared with the power sweeper.

Residues of hazardous materials on all equipment will be eliminated by brushing down the equipment and vacuuming the dusts. This will be done using a high powered vacuum designed for small particle suction and retention. All of the above material (an estimated 15 Gaylord boxes) that is collected will be shipped to an authorized hazardous waste management facility. Since all areas of the facility in proximity to the storage areas are paved (Figure 1), there will not be any contaminated soil to dispose of. Depending on the condition of the facility at closure, wipe or smear tests may be necessary to determine the efficiency of the cleaning activities.

## IV. EQUIPMENT REQUIRED

All equipment required for closure is owned by Roth Bros. and will be operated by Roth Bros.' employees. Table 2 lists the auxiliary equipment to be used. Any equipment used in the closure of the facility will be decontaminated by brushing and vacuuming. Wastes accumulated during this process will also be sent to an authorized hazardous waste management facility.

## V. CLOSURE CERTIFICATION

A licensed professional engineer will monitor and inspect the waste storage areas and, following the completion of closure activities, certify that closure is complete. Certification will be made to the Commissioner by Roth Bros. and the Registered Professional Engineer that the facility has been closed in accordance with the specifications in this Closure Plan.

## VI. COST ESTIMATE

A closure cost estimate, as required by 6 NYCRR 373-2.8, is shown in Table 3.

## TABLE 1

## MILESTONE CHART

December 30, 2035

Notify NYSDEC of Planned Closure
 Date.

March 30, 2036

- Stop processing materials that generate hazardous wastes.
- Begin shipping stored hazardous wastes to an authorized hazardous waste management facility.
- Proceed until "0" inventory is accomplished.

May 15, 2036

- "0" Inventory accomplished.
- Cleanup storage areas and decontaminate equipment. Ship residual wastes to an authorized hazardous waste management facility. All work must be supervised by Professional Engineer.

June 30, 2036

 Submit certification of Closure to the Commissioner.

# TABLE 2 INVENTORY OF AUXILIARY EQUIPMENT

15	Gaylord Boxes with plastic liners and covers
100	50 lb. bags of sweeping compound
1	High Powered Vacuum Cleaner
2	Brooms
2	Shovels
1	5,000 lb. capacity forklift, 1974 Clark
	Serial # 89228133
1	5,000 lb. capacity forklift, 1982 Hyster 550 E
	Serial # D2D10629C
1	Waldon Payloader 1978 Serial # 012492
1	Allis Chalmers Payloader - Model 640, 1983 Serial # 1651
1	Advance Sweeper Serial # 614643 - closed hopper 1978
	Appropriate protective equipment for personnel

\* Note: All equipment is owned by Roth Bros. Smelting Corp.

#### TABLE 3

### FINAL COST ESTIMATE

### As Revised March 1, 1988

- 1. Ship stored boxes of waste to an authorized hazardous waste facility

  Estimate 290 boxes @ \$185/Box \$53,650
- 2. Subcontract power sweeping of three (3) hazardous waste storage areas to outside contractor
  Estimate 8 Hrs. @ \$100/Hr. \$ 800
- 3. Cover three areas with sweeping compound
  Estimate 5,000 lbs. @ \$.0765/lb. \$ 383
- 4. Hand-sweep compound/brush & vacuum equipment
  Estimate 16 Man Hrs. @ \$11/Hr. \$ 176
- 5. Gaylord Boxes with plastic liners and covers for disposal of sweeping compound

  Estimate 15 Boxes @ \$8/ea. \$ 120
- 6. Hand-shovel residual wastes into Gaylord Boxes
  Estimate 16 Man Hrs. @ \$11/Hr. \$ 176
- 7. Clean power sweeper, brooms, and shovels; load residual into Gaylord Boxes
  Estimate 8 Man Hrs. @ \$11/Hr. \$ 88
- 8. Ship waste from decontamination procedures to authorized hazardous waste facility

  Estimate 15 Boxes @ \$200/Box \$ 3,000
- 9. Sampling and analysis of wipe and smear tests
  Estimate as performed by Environmental Lab \$ 120
- 10. Certification by licensed P.E.

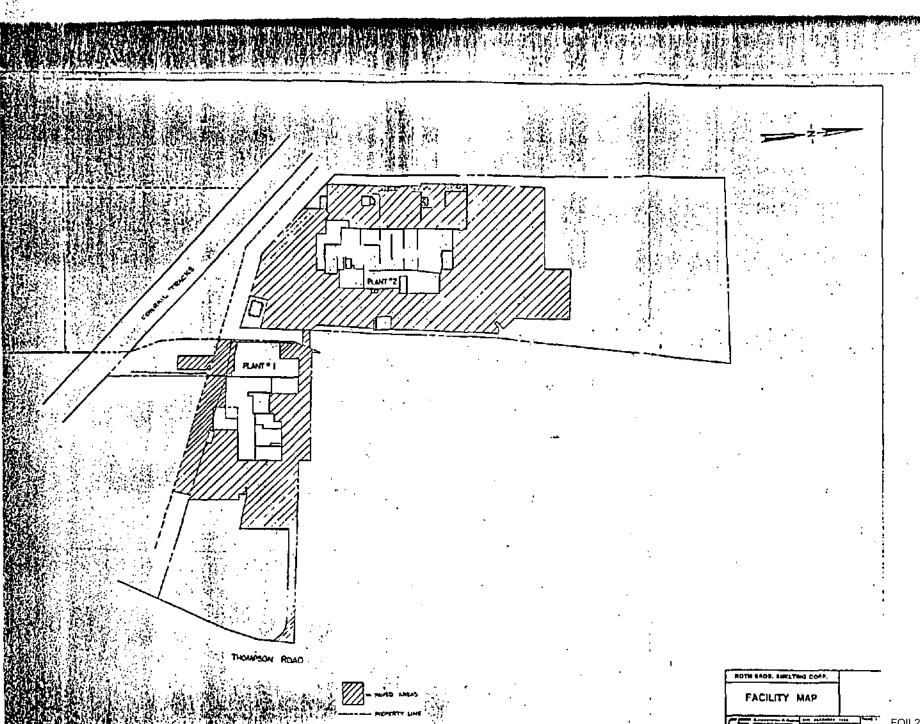
  Estimate as performed by Environmental Lab \$ 385
- 11. Administrative Costs -- Estimate 15% which includes direct supervision of clean-up by Roth Bros.' representative \$ 8,835
- 12. Allowance for Contingency Estimate 15%

\$ 8,835

## TABLE 3

## FINAL COST ESTIMATE

1.	Ship stored boxes of waste authorized hazardous waste		290 boxes \$175/box	\$50,750
2.	Power sweep 3 storage areas (all tarvia covered)	estimate	1 man/2 days	120
3	Cover 3 areas with sweeping	compound estimate	100 50-1b. bags \$7.60/ea.	760
4.	Handsweep compound/brush and vacuum equipment	estimate	1 man/2 days	120
5.	Gaylord boxes with plastic and covers	liners estimate	15 boxes \$7.00/ea	105
6.	Hand shovel residual wastes Gaylord boxes	into estimate	2 men/1 day	120
7.	Clean power sweeper, brooms shovels, load residual into Gaylord boxes		l man/l day	60
€.	Ship waste from decontamina procedures to hazardous was facility		15 boxes \$175/box	2,625
9.	Sampling and analysis of wi	pe		120
10.	Certification by Licensed P	.E.		350
11.	Administrative Costs (15% - Supervision by General Mana			8,270
12.	Contingency (15%)			8,270
		TOTAL		\$71,670

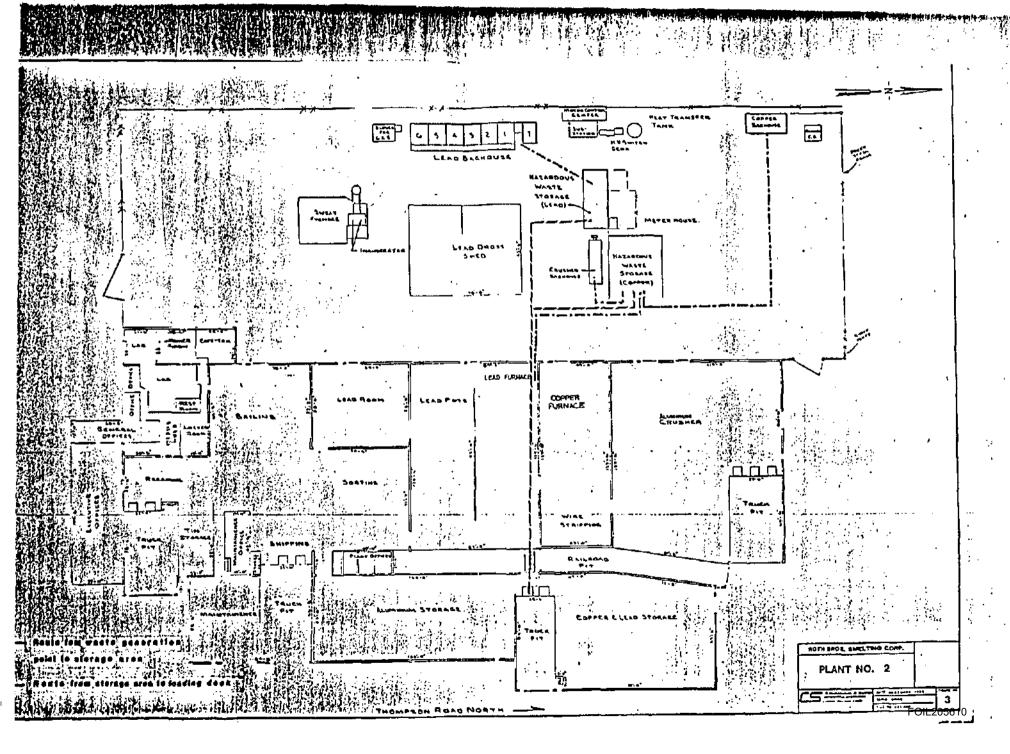


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140





Merchants Bank

April 1, 1986

The Merchants National Bank & Trust Company of Syracuse 216-220 South Warren Stre-PO Box 4950 Syracuse, NY 13221 315-472-5561

Commissioner
New York State Department of Environmental Conservation
'50 Wolf Road
Albany, New York 12233

Re: Letter of Credit No. 860401

Dear Sir or Madam:

We hereby establish and open our Irrevocable Standby Letter of Credit . No. 860401 in your favor, at the request and for the account of Roth Brothers Smelting Corp., 6223 Thompson Road, East Syracuse, New York, 13057, up to the aggregate amount of seventy-one thousand six hundred seventy and no/100 U.S. dollars (\$71,670.00), available upon presentation of

- your sight draft, bearing reference to this letter of credit No. 860401, and
- (2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the New York State Environmental Conservation Law."

This letter of credit is effective as of 4/1/86 and shall expire on 4/1/87, but such expiration date shall be automatically extended for a period of one year on 4/1/87 and on each successive expiration date thereafter, unless, at least 120 days before the current expiration date, we notify both you and Roth Bros. Smelting Corp. by certified mail, return receipt requested, that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft and the above-referred-to signed statement for 120 days after the date of receipt by both you and Roth Bros. Smelting Corp., as shown on the signed return receipts.

This is a notation credit. Each draft hereunder must be endorsed on the reverse of this letter of credit and each draft or attached writing must indicate that such notation has been made. This letter of credit must be attached to the last draft when the credit established by this letter of credit is exhausted.

The sum or sums of all drafts under this letter of credit must not exceed the aggregate amount of seventy-one thousand six hundred seventy and no/100 dollars (\$71,670.00). The purpose of this letter of credit is to ensure that funds will be available and drafts may be drawn hereunder for the account of the Commissioner of the New York State Department of Environmental Conservation, for the benefit of the Department of Environmental Conservation, for purposes pursuant to Article 27 of the New York State Environmental Conservation Law.



Letter of Credit No. 860401

Endorsements of Drafts Drawn.

Page -2-

The Merchants National Bank & Trust Company of Syracuse agrees that whenever this letter of credit is drawn on, under and in compliance with the terms of this letter of credit, that The Merchants National Bank & Trust Company of Syracuse shall duly honor such draft upon presentation to The Merchants National Bank & Trust Company of Syracuse and The Merchants National Bank & Trust Company of Syracuse shall pay the amount of the draft to the Commissioner of the New York State Department of Environmental Conservation or into standby trust in accordance with the Commissioner's instructions.

We certify that the wording of this letter of credit is identical to the wording specified in New York Codes, Rules and Regulations, Title 6, Part 370 et seq., as such regulations were constituted on the date shown immediately below.

Except as otherwise stated herein, this letter of credit is to be governed by the Uniform Customs and Practice for Documenting Credits (1983 Revision), published by the International Chamber of Commerce, Brochure No. 400.

Very truly yours.
THE MERCHANTS NATIONAL BANK & TRUST COMPANY OF SYRACUSE

By: Clambers, Vice President

			OUNT
Date	Negotiated By	In Words	In Figures
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This Letter of Credit shall be cancelled and attached to the last draft.

SCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

5250009492 ...

\* See endorsement attached.

New York State Dept. of Environmental Conservation

Att: Robert C. Kiddle

EMPLOYERS' LIABILITY

OTHER

Pollution

**L**iability

50 Wolf Road

Albany, New York 12233-0001

ASUREY SUBMIT A PROPERTY OF THE PROPERTY OF TH

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF. THE ISSUING COMPANY SECRETARIZED TO MAIL 60 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, RESPERINGED MAIL SECRETARIZED CONTINUES INDICATED AND THE LEFT, RESPERINGED CONTINUES AND THE LEFT, RESPECTATION OF THE LEFT, R

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4/1/87

AUTHORIZED REPRESENTATIVE I

CINCELLATION SERVICE CONCELLATION SERVICE CONTRACTOR SERVICE SER

4/1/86

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\$2,000,000 each

pollution incident.

\$4,000,000 aggregate

(DISEASE-EACH EMPLOYEE

### HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

- 1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insurer's obligation to demonstrate financial responsibility under 6 NYCRR 370 et seq. The coverage applies at EPA ID# 006977086, Roth Bros. Smelting Corp., 6223 Thompson Road, P.C. Box 638, East Syracuse, N.Y. 13057 for sudden and non-sudden accidental occurrences. The limits of liability are \$2,000,000 each pollution incident; \$4,000,000 aggregate, exclusive of defense costs.
- 2. The insurance afforded with respect to such occurrences is subject to all the terms and conditions of the policy; provided, however, that any provision of the policy inconsistent with subsections (a) through (f) of this Paragraph 2 are hereby amended to conform with such subsections (a) through (f):
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
- (b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with the right of reimbursement from the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated by virtue of the insured satisfying the financial test for liability coverage as established by the New York State Department of Environmental Conservation (hereinafter "NYSDEC") or by the Commission of NYSDEC (hereinafter referred to as the "Commissioner"), and as specified in 6 NYCRR 370 et seq.
- (c) Whenever requested by the Commissioner, the Insurer agrees to furnish to the Commissioner a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice, certified mail, return receipt requested, and only after the expiration of sixty (60) days after a copy of such written notice is received by the Commissioner.
- (e) Any other termination of this endorsement will be effective only upon written notice, certified mail, return receipt requested, and only after the expiration of thirty (30) days after a copy of such written notice is received by 5th 205614 Commissioner.

(f) This endorsement shall be attached to and form a part of Policy No. 5250009492 issued by United States Fire Insurance Company, herein called the Insurer, of P O Box 4865, Syracuse, New York to Roth Bros. Smelting Corp. of P O Box 639, East Syracuse, New York 13057 this 8th day of April 1986. The effective date of the policy is the 1st day of April, 1985.

I hereby certify that the wording of this endorsement is identical to the wording specified in 5 NYCRR 370 et seq., as such regulation was constituted on the date first above written, and that the Insurer is authorized by the Superintendent of the New York State Department of Insurance to conduct the business of insurance within the State of New York or is eligible to provide insurance, where applicable, as an excess or surplus lines insurer within the State of New York.

(Signature of Authorized Rep. of Insurer)
Jon M. Maloff

Producer, Authorized Representative of: United States Fire Insurance Company P.C. Box 4865 Syracuse, New York

DATE: 04/08/88

Policy issued to Roth Bros. Smelting Corp.; Endorsement takes effect on April 1, 1986; Policy No. 5250009492; Endorsement number: 1-

(Signature of Authorized Rep. of Insurer)

Jon M. Maloff

Producer, Authorized Representative of: United States Fire Insurance Company P O Box 4865

Syracuse, New York

FOII 205615

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#### APPENDIX B

Hazardous Waste Manifests





Flea	se print or type.	(12-pitch) typewriter.)				Form App	roved, OM	B No. 205	60-0039. Expires 9-30-9
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# HAZARDOUS WASTE MANIFEST (As Required By The Alabama Department of Environmental Management)

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Designated Facility Name and She Address CHEMICAL WASTE MANAGEMENT, IN		A ID Number	G. Sta	te Facility's ID		
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ì	16. GENERATOR'S CERTIFICATION: I hereby			ly and accur	ately de	scribed above by		<del>_</del>
	proper shipping name and are classified, pack according to applicable international and natio			oper conditi	on for 1	ransport by highwi	Эγ	
Ţ	If I am a large quantity generator, I certify that	I have a program in place	to reduce the volume and					
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7		Sarv Coodelle Transport	E IV D	9 18 16 19 16 19	19 14 17		insporter's Phone	, ,	1) 233-2126
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۱	Work Order #: 920930-022	Purchase Order #:	3536			<u> </u>				
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ı	proper shipping name and are classified, pac according to applicable international and nat		respects in pr	roper condit	ion for t	ransport by highw	ev.			
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	economically practicable and that I have select future threat to human health and the environ	ited the procucable method of treatment	storage, or d	isposal curr	ently av	atlable to me which	h minim	izes the present and		
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1	6223 Thompson Road, E. Syrac 4. Generator's Phone (315 )463-950			See			- 1	
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	7. Transporter 2 Company Name	8. U	<u> 5  9  6  9  9  4  7 </u> S EPA ID Number	E. Sta	ite Transporter's	ID		
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1	(Polychlorinated Biphenyls)				Ĭ	78.		
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	economically practicable and that I have select future threat to human health and the environr	ed the practicable method of treatme	nt, storage, or disposal cur	rently as	railable to ma which	minimizes the gresi	ent and	
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# HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

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A	UNIFORM HAZARDOUS WASTE MANIFEST	1, Generator's US EPA ID No. E  Y  D  0  0  6  9  7  7  0	Manife Document	est 2. Par t No., of			the shaded areas ired by federal
	3. Generator's Name and Mailing Address		<u>**   **   +   +   +   +   +   +   +   + </u>	A. Ste	ste Manifest D		
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### HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

(Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039, Expires 9:30-91 Hease print or type. 1. Generator's US EPA ID No. Information in the shaded areas is not required by Federal UNIFORM HAZARDOUS Manifest 2. Page 1 Document Np **WASTE MANIFEST** संभूग । । । । । । । । ७ । ७ । । A. State Manifest Document Number Generator's Name and Mailing Address CWMA 587241 Soch Brothers Smolting Corp. B. State Generator's ID 13957 6233 Thompson Road, E. Syracuse, MY ริสต์ 4. Generator's Phone ( 315 ) 453-9500 Transporter 1 Company Name C. State Transporter's ID T 200757 7777.

D. Transporter's Phone (800) 233-2126. US EPA ID Number Cary Caudella Transport 7. Transporter 2 Company Name 的新疆新列列列列 E. State Transporter's ID US EPA ID Number F. Transporter's Phone 9. Designated Facility Name and Site Address US EPA ID Number G. State Facility's ID Carlo a straig breaks the firm tag an act a side of CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility H. Facility's Phone 205/652-9721 Alabama Highway 17 at Mile Marker 163 [A| L| D| 0| 0| 0| 6| 2 | 2| 4| 6| 4 Emelle, Alabama 35459 I was a second 12. Containers 13. 14. Waste No. .11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Quantity Type Wt/Vo to the second and Ranardous Substance, Solid, c.o.s., (Polychlorinated Biphenyls) **CWM Profile Number** BC 1406 ORM-E, NA 9188 G F / [7] 7(5) 7 CWM Profile Number C. CWM Profile Number <u>a.</u> **CWM Profile Number** J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above inding Codes for vivasies and a second 3. Additional Descriptions for Materials L 11 A 18 15. Special Handling Instructions and Additional Information For Emergency Response: a) 501406 - TECA Required Information Attached Purchase Order #: 20,536 Work Order #: 4 21001-524 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford Printed/Typed Name Signature Month Day Year وروفعه كأوالا 17.Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day 111-141-1 18.Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year 19.Discrepancy Indication Space 20.Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year FOIL205627

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# HAZARDOUS WASTE MANIFEST (As Required By The Alabama Department of Environmental Management)

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<b>!</b>	4. Generator's Phone ( 315 ) 463-95	RECOUNTY OF THE PROPERTY OF TH				<u> </u>				
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# HAZARDOUS WASTE MANIFEST (As Required By The Alabama Department of Environmental Management)

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	4. Generator's Phone ( 315 ) 463-953	<u></u>	<u> </u>		Sa	<u>.                                      </u>	, , <u>-</u> -•			
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	CHEMICAL WASTE MANAGEMENT, INC			•						
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# HAZARDOUS WASTE MANIFEST (As Required By The Alabama Department of Environmental Management)

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1	Gary Goodelle Transport	រ ដ រ	<u>រាស្សសម្គេច</u>	194		nsport	er's Phone	(50	0) 233-212 <del>6</del>	
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J	according to applicable international and nati		,	mon to traits	10:1 UY 11:Q:144	- 1		
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# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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3		3.5 Generator's Namer and Mailing Address		A. State Manifest Document Number
	$\prod_{i}$	Roth Brothers Smelting Corp. 6223 Thompson Road, E. Syracuse, NY 130	3	MI 2540551  B. State Generator's ID
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# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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# HAZARDOUS WASTE MANIFEST (As Required By The Alabama Department of Environmental Management)

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T	UNIFORM HAZARDOUS	1. Generator's US EPA ID No.		Aanifest	2, Pag		tion in	the shaded areas
Ť	WASTE MANIFEST	<u>জিস্সাথাপাগাগ্যাস্থা</u>	1-64 1000	ument No.	of	law.		red by Federal
	3. Generator's Name and Mailing Address					ite Manifest Do		
	Roth Brothers Smelting Corp					WMA 5		Z40
	6223 Thompson Read, E. Syre				8. Ste	ite Generator's	iD	
	4. Generator's Phone ( 515 ) 463-959		<del> </del>	-,		•		* * * * * * * * * * * * * * * * * * * *
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	Cary Goodelle Transport	1 24 24 24 25 25 25 25 25 25 25 25 25 25 25 25 25	1 5 0 8	1 4 4 4	<u> </u>	insporter's Phon		0) 233-2126
	7. Transporter 2 Company Name	e. US Er	'A ID Numbi	er		na Transporter's	A	
П	9. Designated Facility Name and Site Addres	s 10 US FF		<u> </u>	• •	nsporter's Phon	* ***	3 1 1 m
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1	CHEMICAL WASTE MANAGEMENT, INC Emelle Facility	2.						
	Alabama Highway 17 at Mile Marker 163	. A L. D. B. C. O				ility's Phone	· · · · · · · · · · · · · · · · · · ·	
	Emelle, Alabama 35459	ا ۱۹ ۱۹ ۱۹ ۱۹ ۱۹ ۱۹	19/2/2	1 4 1 6 1 4			7	
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11	Work Order #:	Purchase Order #:						
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Ш	economically practicable and that I have select future threat to human health and the environs							
Н	the best waste management method that is ay	vailable to me and that I can afford						
W	Printed/Typed Name	Signature						Month Day Year
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LIT	20.Facility Owner or Operator: Certification of	receipt of hazardous materials cover	ed by this	manifest	toeoxe	as noted in Ite	n 19	
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	j						FOI	L205634 <b>]</b>



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### APPENDIX C

Daily Field Reports



PROJECT: Closure Activities

Roth Bros. Smelting Corp.

DATE: PAGE: 5 Oct. 1992

FILE:

70185-45

1 of 2

CLIENT: CONTRACTOR: WEATHER:

Roth Bros. Smelting Corp.

Action Cleaners

Sunny, 60°

0700: Margaret J. Corrigan (H&A of New York) on site.

0715: Elizabeth D. Henderson (H&A of New York) on site.

0715-0730: Discussed sampling information with EDH.

0730-0800: Met with John Menchella (Roth Bros.) to discuss

closure activities, and tour closure areas.

0800-0815: Roth Bros. personnel provided and assembled

scaffolding to be used in Plant 1 cleaning.

Cleaners on site.

MJC obtained preliminary wipe samples from Plant 1 0815-1015:

and Plant 2 lead and copper storage areas (9 wipe

samples taken).

Obtained pre-cleaning photographs of Plant 1 room. 1010-1020:

1015-1030: Action Cleaners and MJC suited up in Level C

protection to enter room at Plant 1. (5 persons).

1030-1200: Action Cleaners sprayed cleaner over entire room.

Used scaffolding to reach ceiling.

Lunch break. 1215-1315:

1315-1330: Action Cleaners and MJC suited up in Level C

protection to continue cleaning room at Plant 1 (5

persons).

1330-1700: Action Cleaners sprayed down ceiling, walls, and

floor with power sprayer. Ceiling was cleaned using

scaffolding. Walls were power sprayed and scrubbed with brushes (from 8 ft. high to floor level).

Floors were cleaned with power sprayer and brooms.

All water was vacuumed up and disposed of into

drums. Solids were shoveled into drums.

PROJECT:

Closure Activities

Roth Bros. Smelting Corp.

DATE:

5 Oct. 1992

PAGE: FILE:

2 of 2 70185-45

CLIENT: CONTRACTOR:

WEATHER:

Roth Bros. Smelting Corp.

Action Cleaners

Sunny, 60°

1700-1730:

Demobilization and equipment decontamination by

Action cleaners.

1730:

Action Cleaners left site.

1730-1745:

Organizing and labeling sample jars to obtain

confirmation wipe samples.

1745-1815:

Obtained confirmation wipe samples from Plant 1 (5

wall wipes, 1 floor wipe).

1800-1930:

Roth Bros. personnel assisted in attempt to obtain

concrete core samples from Plant 1 room.

1930:

Unable to obtain samples with concrete coring

machine.

1930:

MJC left site, delivered confirmation wipe samples

to Upstate Laboratories in East Syracuse.

FIELD REPRESENTATIVE

Margaret Corrigan

TIME ON SITE

0700-2000

OTHER

1.5 hr. travel

**DISTRIBUTION** 

**PROJECT:** Closure Activities

DATE:

6 Oct. 1992

Roth Bros. Smelting Corp.

PAGE: FILE: 1 of 2 70185-45

CLIENT: CONTRACTOR:

WEATHER:

Roth Bros. Smelting Corp.

Action Cleaners

Sunny, 62°

0700:

MJC on site.

0710:

Met with John Menchella (Roth Bros.). Discussed final preparations regarding removal of all material from Plant 2, lead and copper HWMU storage areas.

0730:

Action Cleaners on site. Dan O'Neill (Action Cleaners) stated they would initiate in copper storage area A.

0730-0745:

MJC took pre-cleaning photographs of copper storage areas A and B.

0745-1000:

John Menchella (Roth Bros.) assisted in obtaining confirmation concrete core samples at Plant 1.

0745-0900:

Action Cleaners prepared equipment used to clean Plant 2, copper storage areas A and B, and the lead storage area.

Action Cleaners and MJC suited up in Level C protection (5 persons) to clean Plant 2, copper storage area A and B.

0900-1030:

Action Cleaners applied cleaner at copper storage area A along walls to the predetermined height (approximately 12 ft.) down to the floor and on the floor. Applied cleaner at copper storage area B on walls and floor, and at lead storage area along walls and floor.

1030-1245:

Action Cleaners sprayed copper storage area A with power sprayer. Began spraying floors from outside to the inside. Problems occurred while cleaning floor. Toward the back of the building grooves in asphalt were discovered. Decided to clean from inside out so material and mud were not caught in the 2-3 in. groves. Also Action Cleaners dug out small trench along North wall of copper storage area A and disposed of those solids in drums.

1230-1245:

Action Cleaners used scrub brush to do final spot cleaning along walls. All water generated during cleaning was vacuumed into drums.

1250-1350:

Lunch break.

FOIL205640

PROJECT:

Closure Activities

DATE:

6 Oct. 1992

Roth Bros. Smelting Corp.

PAGE: FILE: 2 of 2 70185-45

CLIENT:

Roth Bros. Smelting Corp.

CONTRACTOR: WEATHER:

Action Cleaners

Sunny, 62°

1330:

MJC called Elizabeth Henderson (H&A of New York) to inform her of the work progress. She informed me that the air cartridge taken on 5 October 1992 from Plant 1 had come back clean. Therefore, we would no longer need to use respirators. Instead dust masks and safety glasses would be sufficient.

1330:

MJC gave John Menchella air sampling cartridge taken for 4 hrs. at HWMU storage areas on Plant 2, for delivery to Upstate Labs.

1350-1430:

Action Cleaners swept copper storage area B with brooms, then power sprayed walls and floors. Contained all water using vacuums.

1430-1700:

Action Cleaners swept lead storage area C with brooms then power sprayed walls and floor. Brushed down lead storage area walls prior to power spraying. All water was vacuumed and contained in drums.

1700-1730:

Action Cleaners used dry vacuums to power sweep copper storage areas A and B.

1730-1750:

Site demobilization and equipment decontamination by

Action Cleaners.

1800:

Action Cleaners left site.

1800-2015:

MJC obtained confirmation wipe samples from 2 HWMU storage areas on Plant 2.. John Menchella (Roth Bros.) oversaw confirmation concrete core sampling from these areas.

2015:

MJC left site, delivered samples to Upstate

Laboratories, East Syracuse.

FIELD REPRESENTATIVE

TIME ON SITE

OTHER

Margaret Corrigan

0700-2045

DISTRIBUTION

PROJECT:

Closure Activities

DATE:

7 Oct. 1992

Roth Bros. Smelting Corp.

PAGE: FILE: 1 of 1 70185-45

CLIENT:

Roth Bros. Smelting Corp.

CONTRACTOR:

Action Cleaners

WEATHER:

Sunny, 50°

0730:

MJC on site.

0730-0800:

Preparation of paperwork.

0800:

Met with Greg Boltus and Daniel O'Neill (Action Cleaners) to look over Plant 2 HWMU storage areas.

0810-0845:

MJC taped off core sampling locations at Plant 2,

Areas A, B and C.

0910:

Vince B. Dick and Larry P. Smith (H&A of New York)

on site to view closure areas.

0915-0945:

VBD, LPS, MJC (H&A of New York) and John Menchella (Roth Bros.) toured Hazardous Waste Management Units

at Plant 1 and Plant 2.

0945-1000:

VBD, LPS, and MJC toured other areas of Plant 2 for

upcoming RFI tasks.

1000:

VBD and LPS (H&A of New York) left site.

1000-1020:

MJC obtained photographs of HWMU at Plant 1, and

taped off concrete core sample locations.

1030:

MJC left site.

FIELD REPRESENTATIVE Margaret J. Corrigan TIME ON SITE

0730-1030

OTHER

1.5 hrs. travel

DISTRIBUTION

PROJECT: Closure Activities

DATE: PAGE: 15 Oct. 1992

Roth Bros. Smelting Corp.

FILE:

1 of 2 70185-45

CLIENT: CONTRACTOR:

WEATHER:

Roth Bros. Smelting Corp.

Action Cleaners Cloudy/rain, 50°

0730:

MJC (H&A of New York) on site.

0730-0745:

Met with John Menchella (Roth Bros.) to discuss

closure activities.

0745-0815:

Action Cleaners on site and began to prepare

equipment and suit up (saranex and half-mask

respirators).

0815-0845:

Action Cleaners swept up lead storage Plant 2, with

brooms and disposed of dirt and debris into a drum.

0845-0900:

Action Cleaners applied cleaner to floor and

scrubbed with brooms.

0900-0945:

Action Cleaners power sprayed floor in lead storage

area on Plant 2. All water was vacuumed up and

disposed of into drums.

0945-1000:

Site demobilization and equipment decontamination by

Action Cleaners.

1000:

Action Cleaners left site.

1000-1030:

Discussed sample locations with John Menchella (Roth

Bros.) and Vince Dick (H&A of New York).

1030-1100:

Roth Bros. personnel set up core machine to obtain

composite TCLP lead samples in lead storage area on

Plant 2.

1100-1200:

Obtained core samples from predetermined locations.

PROJECT:

Closure Activities

Roth Bros. Smelting Corp.

DATE: PAGE:

15 Oct. 1992

FILE:

2 of 2 70185-45

CLIENT:

Roth Bros. Smelting Corp.

CONTRACTOR: WEATHER:

Action Cleaners Cloudy/rain, 50°

1200-1215:

MJC taped off concrete core sample locations.

1230:

MJC left site, delivered confirmation TCLP lead core

samples to Upstate Laboratories

FIELD REPRESENTATIVE

TIME ON SITE

OTHER

Margaret J. Corrigan

0730-1230

3.75 hrs. travel

DISTRIBUTION

Appendix D

Appendix

### APPENDIX D

Laboratory Analytical Results



### Upstate boratories inc.

REJEIVED H&A OF NEW YORK

Shipping: 6034 Corporate Drive • East Syracuse, New York 13057 • (315) 437-0255 ... Mailing: Box 289 • Suracuse, New York 13206

Southern Region (607) 724-0478

Western Region (716) 436-9070 Eastern Region (518) 459-3134

October 14, 1992

Mr. John Menchella Roth Bros. Smelting Corp. 6223 Thompson Rd. E. Syracuse, NY 13057

Analysis Report #101492011 - Roth Brothers Closure Activities

Dear Mr. Menchella:

Please find enclosed the results for your samples which were received on October 5 and 6, 1992.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your sample.

Should you have any questions, please feel free to give us a call.

Thank you for your patronage.

Sincerely.

UPSTATE LABORATORIES, INC.

nthony of scale Anthony J. Scala

Director

AJS/lw

Enclosures: report, invoice

cc/encs: N. Scala, ULI

file

E. Henderson, H&A of New York (copy report)

Faxed results were given to your office and E. Henderson, H&A of New York, on 10/7, 10/9 and 10/13/92. AJS

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULA to be accurate and reliable for sample(s) tested. accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.

DATE: 10/14/92

Jpetate Laboratories, Inc. Analysis Results Report Number: 101492011 Cleent I.D.: ROTH BROS. SMELTI	APPROVAL:			
ID <u>-</u> 27992127 Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES C-1 10	/5/92 G		
PARAMETERS	RESULTS	KEY		
Total Cadmium Total Lead PCB	<0.0005mg/wipe <0.01mg/wipe			
Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242 Aroclor 1248 Aroclor 1254 Aroclor 1260 Total PCB	<0.lug/l	34 34 34 34 34 34 34 32		
ID 27992128 Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES C-2 10	/5/92 G		
Parameters	RESULTS	KEY		

PARAMETERS		RESULTS	KEY
Total C	admium	0.0036mg/wipe	
Total L	ead	0.11mg/wipe	
PCB			
A	roclor 1221		34
A	roclor 1016		34
A	roclor 1232		34
· A	roclor 1242		34
A	roclor 1248		34
A	roclor 1254		34
A	roclor 1260		34
T	otal PCB	<0.1ug/l	32

results are on an as rec.d basis unless otherwise stated.

Aroclor 1016

Aroclor 1232

Aroclor 1242

Aroclor 1248

Aroclor 1254

Aroclor 1260

Total PCB

PATE: 10/14/9  Ipstate Labor Inalysis Resident Number	ratories, In ults r: 101492011		APPROVAL: _ () QC: _ DO [ Lab Sampled by: C	.D.: 10170	
D_27992129 I	Mat:Wipe	ROTH BROTHERS	CLOSURE ACTIVITIES C-3	l0/5/92 G	
PAI	RAMETERS		RESULTS	KEY	
	Cadmium Lead PCB		0.014mg/wipe 2.7mg/wipe		
	Aroclor 12 Aroclor 10 Aroclor 12 Aroclor 12	16 32	0.6ug/l	34 32 34 34	
•	Aroclor 12 Aroclor 12 Aroclor 12 Total PCB	54	1.8ug/l 2.4ug/l	34 32 34 32	
D <b>2</b> 7992130	 Mat:Wipe	ROTH BROTHER	S CLOSURE ACTIVITIES C-4	10/5/92 G	
PA	RAMETERS		RESULTS	KEY	
Total Total	Cadmium Lead PCB		0.0097mg/wipe 1.4mg/wipe		
	Aroclor 12	21		34	

0.6ug/l

1.2ug/l

1.8ug/l

Alt results are on an as rec.d basis unless otherwise stated.

32

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DATE: 10/14/92

Jp tate Laboratories, Inc.

Analysis Results

APPROVAL: \_ QYO\_ Lab 2.D.: 10170

Analysis Results Report Number: 101492011 Clarent I.D.: ROTH BROS. SME		QC:_ QC /  Lab		
ED_27992131 Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES	S C-5 10/5/92 G		
PARAMETERS	RESULTS	KEY		
Total Cadmium Total Lead PCB	<0.005mg/wipe	ipe		
Aroclor 1221 Aroclor 1016 Aroclor 1232		34 34		
Aroclor 1242 Aroclor 1248 Aroclor 1254		34 34 34 34		
Aroclor 1260 Total PCB	<0.1ug/l	34 34 32		
ID <b>=27</b> 992132 Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES	S C-6 10/5/92 G		
PARAMETERS	RESULTS	KEY		
Total Cadmium Total Lead PCB	0.0080mg/wip 1.3mg/wipe	pe		
Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242	0.3ug/l	34 32 34 34		
Aroclor 1248 Aroclor 1254	0.5ug/l	34 32		

0.8ug/l

ald results are on an as rec.d basis unless otherwise stated.

Aroclor 1260

Total PCB

34

32

AlT results are on an as rec.d basis unless otherwise stated.

ATE: 10/14/9				_	
-	ratories, Inc.		APPROVAL: _ CYO_		
nalysis Resu er <b>e</b> rt Number		QC: DC Lab I D	.: 10170		
lint I.D.:	ROTH BROS, SMELT				
D 7992133 I	Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES C-7 10/	5/92 G		
PAF	RAMETERS	RESULTS	KEY		
Total Total	Cadmium Lead PCB	0.053mg/wipe 6.1mg/wipe	<del></del> -		
	Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242	0.4ug/l	34 32 34 34		
	Aroclor 1248 Aroclor 1254 Aroclor 1260 Total PCB	0.7ug/l 1.1ug/l	34 32 34 32		
D 7992134 I	Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES C-8 10/	5/92 G		
PAI	RAMETERS	RESULTS	KEY		
	Cadmium Lead PCB	0.0085mg/wipe 2.4mg/wipe		.•	
	Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242 Aroclor 1248 Aroclor 1254		34 34 34 34 34 34	,	
	Aroclor 1260 Total PCB	<0.1ug/l	34 32		

ATE: 10/14/92

tate Laboratories, Inc.

nalysis Results

Remort Number: 101492011

lent I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: ASP\_

Lab **V**.D.: 10170

Sampled by: Client

D<u>:2</u>7992135 Mat:Wipe

#### ROTH BROTHERS CLOSURE ACTIVITIES C-9 10/5/92 G

PARAMETERS	RESULTS	KEY
Total Cadmium Total Lead	0.0064mg/wipe 1.3mg/wipe	
PCB		
Aroclor 1221		34
Aroclor 1016		34
Aroclor 1232		34
Aroclor 1242		34
Aroclor 1248		34
Aroclor 1254		34
Aroclor 1260		34
Total PCB	<0.10a/1	32

laresults are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92 Jp tate Laboratories, Inc.
Analysis Results
Report Number: 101492011
Clent I.D.: ROTH BROS. SMELTING CORP. APPROVAL: \_\_ (LY)\_ Lab Y.D.: 10170 Sampled by: Client ID:27992183 Mat:Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-101 10/5/92 G **PARAMETERS** RESULTS KEY Total Cadmium <0.0005mg/wipe Lead Total 0.02mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 34 Total PCB <0.1ug/l ID=27992184 Mat:Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-103 10/5/92 G **PARAMETERS** RESULTS KEY Total Cadmium <0.0005mg/wipe

Total Lead 0.01mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 34 Total PCB <0.1ug/132 DATE: 10/14/92

Upetate Laboratories, Inc Analysis Results Resort Number: 101492011 Cleent I.D.: ROTH BROS. S tate Laboratories, Inc.

ent I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: OYP

Sampled by: Client

27992185 N	Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES C-104	10/5/92 G
PAF	RAMETERS	RESULTS	KEY
Total	Cadmium	<0.0005mg/wipe	<del></del>
Total	Lead	0.02mg/wipe	
I	PCB		
	************************		24
	Aroclor 1221 Aroclor 1016		34
	Aroclor 1016 Aroclor 1232		34 34
	Aroclor 1242		34 34
	Aroclor 1242		3 <del>4</del> 34
	Aroclor 1254		34
	Aroclor 1260		34
•	Total PCB	<0.1ug/l	32
27992186 PAI	RAMETERS	ROTH BROTHERS CLOSURE ACTIVITIES C-105 RESULTS	KEY
<b>—</b>		dest one who who who who had	Bain ands alle
Total	Cadmium	<0.0005mg/wipe	
_ Total	Lead	0.02mg/wipe	
1	PCB	<del>-</del>	•
	Aroclor 1221		34
· <b>m</b>	Aroclor 1016	•	34
•	Aroclor 1232		34
_	Aroclor 1242		34
=	Aroclor 1248		34
1	Aroclor 1254		34
=	Aroclor 1260		34
_	Total PCB	<0.1ug/l	32

DATE: 10/14/92

Aroclor 1242

Aroclor 1248

Aroclor 1254

Aroclor 1260

Total PCB

Jp tate Laboranalysis Res Report Number	ratories, ults r: 1014920		<del>-</del>	10170 ent	
D 27992187	Mat:Wipe	ROTH BE	ROTHERS CLOSURE ACTIVITIES C-106 1	.0/5/92 G	
E PA	RAMETERS		RESULTS	KEY	
Total Total	Cadmium Lead PCB	•	<0.0005mg/wipe 0.02mg/wipe	<b></b>	
	Aroclor Aroclor			34 34	
	Aroclor Aroclor Aroclor	1242		34 34	
	Aroclor Aroclor	1254		34 <b>34</b> 34	
	Total PO		<0.1ug/l	32	
ID <b>=2</b> 7992188	Mat:Wipe	ROTH BE	ROTHERS CLOSURE ACTIVITIES C-107 1	10/5/92 G	
PA	RAMETERS		RESULTS	KEY	
Total	Cadmium Lead PCB		<0.0005mg/wipe 0.02mg/wipe		
	Aroclor Aroclor Aroclor	1016	·	34 34 34	
4					

<0.1ug/l

Alf results are on an as rec.d basis unless otherwise stated.

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ATE: 10/14/92

27992189 Mat:Wipe	ROTH BROTHERS	CLOSURE	ACTIVITIES	TRIP WIPE	10/5/92
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parate Laboratories, Inc. nalysis Results epart Number: 101492011 light I.D.: ROTH BROS. SMELTING	APPROVAL:	10170
D:27992189 Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES TRIP WIPE	10/5/92
PARAMETERS	RESULTS	KEY
Total Cadmium Total Lead PCB	<0.0005mg/wipe 0.01mg/wipe	
Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242 Aroclor 1248	0.2ug/l	34 32 34 34 34
Aroclor 1254 Aroclor 1260 Total PCB	0.5ug/l 0.7ug/l	32 34 32

laresults are on an as rec.d basis unless otherwise stated.

ATE: 10/14/92 APPROVAL: \_ Lys\_ p: ate Laboratories, Inc. nalysis Results Lab I.D.: 10170 emrt Number: 101492011 1 nt I.D.: ROTH BROS. SMELTING CORP. Sampled by: Client ROTH BROTHERS CLOSURE ACTIVITIES C-101 10/6/92 C D:28092001 Mat:Solid **PARAMETERS** RESULTS KEY TCLP Cadmium 0.022mg/1TCLP Lead <0.1mg/lD=8092002 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-102 10/6/92 C PARAMETERS KEY

RESULTS

TCLP Cadmium TCLP Lead

0.020 mg/10.3mg/1

results are on an as rec.d basis unless otherwise stated.

ATE: 10/14/92

Analysis Res Resprt Numbe:	ratories, Inc. ults r: 101492011 ROTH BROS. SMELT	δc: <u></u> Љ.	Lab 1.D.: 10170 by: Client
D.28192014	Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES	G C-108 10/6/92 G
PA	RAMETERS	RESULTS	KEY
Total Total	Cadmium Lead PCB	0.0031mg/wipe	pe
	Aroclor 1221 Aroclor 1016 Aroclor 1232		34 34 34
	Aroclor 1242 Aroclor 1248 Aroclor 1254	0.7ug/wipe	32 34 34
Ī	Aroclor 1260 Total PCB	0.3ug/wipe 1.0ug/wipe	32 32
ID 28192015	Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES	S C-109 10/6/92 G
PA	RAMETERS	RESULTS	KEY 
Total Total	Cadmium Lead PCB	0.0011mg/wipe 0.36mg/wipe	pe
•	Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242	0.4ug/wipe	34 32 34 34
	Aroclor 1248 Aroclor 1254 Aroclor 1260 Total PCB	0.1ug/wipe 0.5ug/wipe	34 32 34 32

results are on an as rec.d basis unless otherwise stated.

DATE: 10/14/92

Unitate Laboratori Analysis Results Report Number: 101 Clent I.D.: ROTH			.: 10170 nt	
ID:28192016 Mat:Wi	pe ROTH BR	OTHERS CLOSURE ACTIVITIES C-110 1	0/6/92 G	
PARAMETE	RS	RESULTS	KEY	
Total Cadm Total Lead PCB		0.0009mg/wipe 0.08mg/wipe		
Aroc Aroc Aroc	lor 1221 lor 1016 lor 1232 lor 1242	2.Oug/wipe	34 32 34 34	
Aroc Aroc	lor 1248 lor 1254 lor 1260 l PCB	0.15ug/wipe 2.2ug/wipe	34 32 34 32	
ID:28192017 Mat:Wi	pe ROTH BR	OTHERS CLOSURE ACTIVITIES C-111 1	0/6/92 G	
PARAMETE	RS	RESULTS	KEY 	
Total Cadm		0.0011mg/wipe 0.04mg/wipe		
Aroc Aroc Aroc Aroc	clor 1221 clor 1016 clor 1232 clor 1242 clor 1248 clor 1254 clor 1260		34 34 34 34 34 34 34	

<0.lug/wipe

results are on an as rec.d basis unless otherwise stated.

Total PCB

32

nalysis Results emert Number: 101492011 1: nt I.D.: ROTH BROS. SMELTING CORP. Sampled by: Client ROTH BROTHERS CLOSURE ACTIVITIES TRIP WIPE 10/6/92 28192018 Mat:Wipe PARAMETERS RESULTS KEY -----Cadmium 0.0009mg/wipe Total Total Lead <0.01mg/wipe PCB 34 Aroclor 1221 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 Total PCB <0.1ug/wipe 8192019 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-108 10/6/92 C RESULTS KEY PARAMETERS \_\_\_\_\_ \_\_\_ TCLP Cadmium  $0.090 \, \text{mg/l}$ TCLP Lead 3.1 mg/lB192020 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-112 10/6/92 C **PARAMETERS** RESULTS KEY \_\_\_\_\_ TCLP Cadmium 0.008 mg/l

0.7mg/l

APPROVAL: \_ CAO \_

ATE: 10/14/92

TCLP

Lead

results are on an as rec.d basis unless otherwise stated.

ate Laboratories, Inc. :

APPROVAL: an state Laboratories, Inc. Analysis Results Report Number: 101492011 Lent I.D.: ROTH BROS. SMELTING CORP. Sampled by: Client ID: 28192021 Mat: Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-112 10/6/92 G RESULTS PARAMETERS KEY -----Total Cadmium 0.0052mg/wipe Total Lead 0.64mg/wipe PCB Aroclor 1221 34 Aroclor 1016 0.2ug/wipe 32 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 0.3ug/wipe 32 Aroclor 1260 Total PCB 0.5ug/wipe 28192022 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-113 10/6/92 C **PARAMETERS** RESULTS KEY \_\_\_\_ TCLP Cadmium 0.057 mg/1TCLP Lead 2.4 mg/l28192023 Mat:Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-113 10/6/92 G PARAMETERS RESULTS KEY Total Cadmi Total Lead Cadmium 0.0059mg/wipe 1.1mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 34

<0.1ug/wipe

DATE: 10/14/92

Total PCB

results are on an as rec.d basis unless otherwise stated.

32

ATE: 10/14/92

Jp ate Laboratories, Inc.

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Analysis Results
Report Number: 101492011
Claim I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: \_ APPROV

Sampled by: Client

28192024	Mat:Wipe	ROTH	BROTHERS CLOSURE ACTIVITIES C-114	10/6/92 G	_
P)	ARAMETERS		RESULTS	KEY	
■ Total	Cadmium		0.0011mg/wipe		
Total Total			0.06mg/wipe		
	PCB		o, o o mg, mege		
_	Aroclor	1221	•	34	
	Aroclor		•	34	
	Aroclor			34	
	Aroclor			34	
	Aroclor			34	
	Aroclor			34	
	Aroclor	1260		34	
j	Total Po	CB	<0.lug/wipe	32	
28192025	Mat:Wipe	ROTH	BROTHERS CLOSURE ACTIVITIES C-115	10/6/92 G	-
P.	ARAMETERS		RESULTS	KEY	
• -					
Total				The state of the s	
Total	Cadmium		<0.0005mg/wipe		
Total			<0.0005mg/wipe 0.10mg/wipe		
Total					
Total	Lead PCB				
Total	Lead PCB Aroclor			34	
Total	Lead PCB Aroclor Aroclor	1016		34	
Total	Lead PCB Aroclor Aroclor Aroclor	1016 1232		34 34	
Total	Lead PCB Aroclor Aroclor Aroclor Aroclor	1016 1232 1242		34 34 34	
Total Total	Lead PCB Aroclor Aroclor Aroclor Aroclor Aroclor	1016 1232 1242 1248		34 34 34 34	
iotai	Lead PCB Aroclor Aroclor Aroclor Aroclor	1016 1232 1242 1248 1254		34 34 34	

<0.1ug/wipe

results are on an as rec.d basis unless otherwise stated.

Total PCB

32

DATE: 10/14/92 APPROVAL: Z tate Laboratories, Inc. Analysis Results Remort Number: 101492011 Lab I.D.: 10170 Clent I.D.: ROTH BROS. SMELTING CORP. Sampled by: Client ID: 28192026 Mat: Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-116 10/6/92 G PARAMETERS RESULTS KEY Total Cadmium 0.0018mg/wipe Total Lead 0.09mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 Total PCB <0.lug/wipe 28192027 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-117 10/6/92 C PARAMETERS RESULTS KEY TCLP Cadmium < 0.005 mg/10.5 mg/lROTH BROTHERS CLOSURE ACTIVITIES C-118 10/6/92 C

RESULTS

< 0.005 mg/l

0.3mg/1

PARAMETERS

TCLP Cadmium

TCLP Lead

KEY

Lab I.D.: 10170 Reort Number: 101492011 Sampled by: Client Cant I.D.: ROTH BROS. SMELTING CORP. 28192029 Mat:Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-118 10/6/92 G **PARAMETERS** RESULTS KEY \_\_\_\_\_ --------Total Cadmium 0.011mg/wipe Total Lead 1.4mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 0.11ug/wipe 32 Aroclor 1260 34 Total PCB 0.11ug/wipe 28192030 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-119 10/6/92 C RESULTS **PARAMETERS** KEY TCLP Cadmium < 0.005 mg/1TCLP Lead 0.3mg/l28192031 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-120 10/6/92 C **PARAMETERS** RESULTS KEY \_\_\_\_\_ TCLP Cadmium 0.099 mg/lTCLP Lead 13mg/l

ATT results are on an as rec.d basis unless otherwise stated.

APPROVAL: W

DATE: 10/14/92

Analysis Results

Untate Laboratories, Inc.

Lab I.D.: 10170 Remrt Number: 101492011 nt I.D.: ROTH BROS. SMELTING CORP. Sampled by: Client ROTH BROTHERS CLOSURE ACTIVITIES C-120 10/6/92 G 28192032 Mat:Wipe **PARAMETERS** RESULTS KEY Total Cadmium 0.0083mg/wipe Total Lead 1.3mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 Total PCB <0.lug/wipe **2**8192033 Mat:Solid ROTH BROTHERS CLOSURE ACTIVITIES C-121 10/6/92 C PARAMETERS RESULTS TCLP Cadmium 0.086 mg/l(4.4mg/l) - ?; TCLP Lead 8192034 Mat:Wipe ROTH BROTHERS CLOSURE ACTIVITIES C-122 10/6/92 G **PARAMETERS** RESULTS KEY \_\_\_\_\_ Total Cadmium 0.0024mg/wipe Total Lead 0.24mg/wipe PCB Aroclor 1221 34 Aroclor 1016 34 Aroclor 1232 34 Aroclor 1242 34 Aroclor 1248 34 Aroclor 1254 34 Aroclor 1260 34

<0.lug/wipe

APPROVAL: \_ (2/19 \_

ATE: 10/14/92

malysis Results

p**a**ate Laboratories, Inc.

Total PCB

AlT results are on an as rec.d basis unless otherwise stated.

32

DATE: 10/14/92

Ur tate Laboratories, Inc.

Analysis Results

Remort Number: 101492011

Clent I.D.: ROTH BROS. SMELTING CORP.

Aroclor 1221

Aroclor 1016

Aroclor 1232

Lab I.D.: 10170

Sampled by: Client

	<del></del>		
ID-28192035 Mat:Wipe	ROTH BROTHERS CLOSURE ACTIVITIES C-123	10/6/92 G	
PARAMETERS	RESULTS	KEY	
Total Cadmium Total Lead PCB	0.0019mg/wipe 0.16mg/wipe		
Aroclor 1221 Aroclor 1016 Aroclor 1232 Aroclor 1242 Aroclor 1248 Aroclor 1254 Aroclor 1260 Total PCB	<0.1ug/wipe	34 34 34 34 34 34 34 32	
ID=28192036 Mat:Wipe PARAMETERS	ROTH BROTHERS CLOSURE ACTIVITIES C-124  RESULTS	10/6/92 G KEY 	
Total Cadmium Total Lead PCB	0.0015mg/wipe 0.06mg/wipe		

Aroclor 1242 34
Aroclor 1248 34
Aroclor 1254 34
Aroclor 1260 34
Total PCB <0.1ug/wipe 32

results are on an as rec.d basis unless otherwise stated.

34

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ATE: 10/14/92

pate Laboratories, Inc.

nalysis Results
terrt Number: 101492011
that I.D.: ROTH BROS. SMELTING CORP.

APPROVAL: \_CUb\_

Sampled by: Client

<b>281</b> 92037	Mat:Wipe	RO'	TH BROTHERS	CLOSURE	ACTIVITIES C-12	5 10/6/92	G
PA	RAMETERS			RES	SULTS		KEY
Total	Cadmium				.0028mg/wipe		
Total	Lead PCB			0	.31mg/wipe		
	Aroclor	1221					34
	Aroclor	1016					34
	Aroclor	1232					34
1	Aroclor	1242					34
B	Aroclor	1248					34
	Aroclor	1254					34
B	Aroclor	1260					34
	Total PC			<	0.lug/wipe		32
					ACOTHIOTIC C_1'	16 16/6/02	C
8192038 PA	RAMETERS	, ac	TH EKUTHERS		ACTIVITIES C-12 SULTS 	26 10/6/92	G KEY
PA	RAMETERS	, ac	TH BRUTHERS	RE:	SULTS 	26 10/6/92	
PA  Total	RAMETERSCadmium	, ac	TH BRUIHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	
PA Total Total	RAMETERS	, ac	TH BRUTHERS	RE:	SULTS 	26 10/6/92	
PA Total Total	Cadmium		TH BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	
PA Total Total	Cadmium Lead	1221	TH BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	KEY
PA Total Total	Cadmium Lead PCB	1221 1016	TH BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	KEY
PA Total Total	Cadmium Lead PCB Aroclor	1221 1016 1232	THE BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	XEY
PA Total Total	Cadmium Lead PCB Aroclor Aroclor	1221 1016 1232 1242	THE BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	KEY  34 34 34
PA Total Total	Cadmium Lead PCB Aroclor Aroclor Aroclor	1221 1016 1232 1242 1248	THE BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	34 34 34 34 34
PA Total Total	Cadmium Lead PCB Aroclor Aroclor Aroclor Aroclor	1221 1016 1232 1242 1248 1254	THE BRUTHERS	RE:	SULTS  .014mg/wipe	26 10/6/92	XEY 34 34 34 34 34 34 34

#### KEY PAGE

- 1 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS
- 2 MATRIX INTERFERENCE
- 3 PRESENT IN BLANK
- 4 INSUFFICIENT SAMPLE
- 5 SAMPLE DILUTED
- 6 BLANK CORRECTED
- 7 HEAD SPACE PRESENT IN SAMPLE
- 8 BDL(BELOW DETECTION LIMITS)
- 9 MDL(METHOD DETECTION LIMITS)
- 10 ADL(AVERAGE DETECTION LIMITS)
- 11 PQL(PRACTICAL QUANTITATION LIMIT)
- 12 SAMPLE ANALYZED OVER HOLDING TIME
- 13 DISSOLVED VALUE MAY BE HIGHER THAN TOTAL DUE TO CONTAMINATION FROM THE FILTERING PROCEDURE OR VALUES WITHIN EXPERIMENTAL ERROR
- 14 MG/L / PPB
- 15 MG/L(MILLIGRAMS PER LITER), PPM(PARTS PER MILLION)
- 16 UG/L(MICROGRAMS PER LITER), PPB(PARTS PER BILLION)
- 17 PARAMETER NOT ANALYZED WITHIN 15 MINUTES OF SAMPLING
- 18 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/TOTAL XYLENES INCLUDE O, M, AND P
- 19 CALCULATION BASED ON DRY WEIGHT
- 20 SAMPLE DILUTED/TOTAL XYLENES INCLUDE O, M, AND P
- 21 TOTAL XYLENES INCLUDE O, M, AND P/NON-POTABLE WATER SOURCE
- 22 MG/KG AS REC.D / MG/KG DRY WT
- 23 INSUFFICIENT SAMPLE PRECLUDES LOWER DETECTION LIMITS
- 24 SAMPLE DILUTED/BLANK CORRECTED
- 25 ND(NON-DETECTED)
- 26 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/BLANK CORRECTED
- 27 SPIKE RECOVERY ABNORMALLY HIGH/LOW DUE TO MATRIX INTERFERENCE
- 28 FIELD PARAMETER TO BE PROVIDED ON DISC
- 29 TOTAL XYLENES INCLUDE O, M, AND P
- 30 METHOD PERFORMANCE STUDY HAS NOT BEEN COMPLETED/ND(NON-DETECTED)
- 31 FIELD MEASURED PARAMETER TAKEN BY CLIENT
- 32 SAMPLE WEATHERED
- 33 NON-POTABLE WATER SOURCE
- 34 INDIVIDUAL AROCLORS DO NOT CARRY A DETECTION LIMIT BUT ARE INCLUSIVE TO THE TOTAL PCB CONTENT
- 35 TOTAL XYLENES INCLUDE O, M, AND P/NON-POTABLE WATER SOURCE/SAMPLE DILUTED
- 36 MATRIX INTERFERENCE CAUSING SPIKES TO RESULT IN LESS THAN 50.0% RECOVERY
- 37 MG/L / LBS PER DAY
- 38 MG/LCL2 / LBS PER DAY
- 39 UG/L / LBS PER DAY

## ROTH BROS. SMELTING CORP. 1017 have. CHAIN OF CUSTODY RECORD

PROJECT NAME & DESCRIPTION SAMPLE LOG No. Roth Brothers Closure activities SAMPLERS NAME: MARGARET J. CORRIGON DATE SAMPLED: 10/5/92 ANALYSIS SON P SAMPLE SAMPLE No. OF SAMPLE LOCATION TIME DATE REMARKS TYPE CONTAINERS No. Total Lead C-110-5-92 wide 128 C-2 10-5-92 WW 129 C-3 10-5-92 wipe. C-4 11 10-5-92 well C-5 11 10-5-92 WUDL C-6 10-5-92 Ħ ዮ.-ዣ 10-5-92 WLDE C - 810-592 C-9 WERR 10-5-92 TOTAL: RECEIVED BY (SIGN) DATE TIME RELINQUISHED BY: (SIGN) 2 Stunt Spen 10-5-92 1 Mayaret 1 RELINQUISHED BY: (SIGN) DATE TIME RECEIVED BY (SIGN) Applicate Simiano 10.5-92 -16,25 I HEREBY CERTIFY THAT I AM QUALIFIED TO DETAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):



ROTH BROS. SMELTING CORP. 10 CHAIN OF CUSTODY RECORD 10

SAMPL	E LOG	No.		CT NAME							28.
			<u></u>	oth B	107	the.	rs	<u>U osu</u>	<u>re Activ</u>	ities	
SAMPL	ERS NA	LME:	<u>Nargaret</u>	J. Cor	<u> </u>	pc		DATE	SAMPLED.	10/5/92	_
SAMPLE No.	DATE	TIME	SAMPLE IO	CATION	GRAB	COMP.		AMPLE TYPE	No. OF CONTAINERS	Analysis REMARKS	rife
183	10-5-92		C-101		<b>✓</b>		WY	کیا	(2)	Total (cg)	)_
184	10-5-92		C-103		<u> </u>		WY		(Z)	11	(\$
185	10-5-92		C-104		<b>V</b>		$w_{\mathcal{U}}$	عد	<u> </u>	41	48 hrs Turngramound
186	10-5-92	_	C-105		1		wi	pe	(2)	ч	1 =
187	10-5-92		C-106		/		TUL	pe_	(a)	11	173
86	10-5-92		C-107-		/			pe	(Z)	'1	13.00
189	ļ		Trip W	نهد				· 	2		/ t \ =
			<u>C</u> .					_			
· 						:		- a - a -		NIOSY MEN 7082 for	full.
19D	10-5-92	4 hrs	Plant 1		✓		ري و	سرطعد	(1)	7082 for	noc Lead
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		<u> </u>			<u> </u>				<u> </u>		
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	<u> </u>									<u> </u>	
								TOTAL		<u> </u>	1
	<del> </del>	<u>.</u>		DAME	_				<u></u>	<del></del>	1
	ISHED BY			DATE	Ι.	TKE 324	_ I -	RECEIVED B	Y (SIGN)	tech	0:
<b></b>	ayan		anoa-	10-5-92	╧	735	<del>-</del>	r pur	woyf		
RELINQUI	ishkd by:	: (SIGN)	,	DATE		TIME	·   •	RECEIVED B	y (Sign)		Z
2	· · ·	<u> </u>		<u> </u>	<u>  .</u>	<u>.</u>		<u> </u>			$\mathcal{Q}_0$
I HEREBY	CERTIFY TI	O NY I TA	UALIFIED TO OBTAI	n sapples an	D TH	AT TH	ns sam In)	ple <b>v</b> as taki	EN ACCORDING TO	THE SAMPLING	2.1992183
REQUIRENE	H T32 ZIN	RTH IN 4	0 CFR 261	(2M :- ∖8-	<u>46)</u>	, , , , , , , , , , , , , , , , , , ,		/—	<u>a i nasa ang ang</u>	en la propieta de la companya de la	(1)
<del></del> .		1	744	HAZZ		Á	18	<b>6</b>			3-/
rangen sambabi a spece	inga was a sama augm		mily a compliant some controls							FOIL205670	9

: 28092001-2 CORP. 1819 have



## ROTH BROS. SMELTING CORP. CHAIN OF CUSTODY RECORD

SAMPI 	E LOG	No.	H	ot NAME h Bro					e Activi	Hes	
SAMPI	ERS NA	<i>ME</i> :_	Nargaret	Corcia	$\alpha$	)		DATE	SAMPLED:	10/0	, /92
SAMPLE No.	DATE	TIME	SAMPLE LO			COMP.		AMPLE TYPE	No. OF CONTAINERS	AMAL <del>REV</del>	
1	10-6-9	)	C-101				CO	rو	0	ተርሆ ጉርኒዖ	Lead Cadmic m
۵	10-(,-92		C-102			\	Co	re	(1)	TOUP	Cadmu
					_/	$\triangleleft$	N	OTE:	<del></del>		
					$\langle \cdot  $	_		60 h	ur		
			-		$\forall$	-			round	1	me
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and the second				-			• •	TOTAL		<del>                                     </del>	
RELINQU	ISHED BY:	(SIGN)	•	DATE	. <b>T</b>	DME ·	F	ECEIVED BY	(SIGN)	ا ہ	
1 M	maret	J. Q-	Dig-	10-6-92			:	2 Th	all	hook	
RELINOU	ISHED BY:	(SIGN)	1	DATE		TIME	*	ECEIVED BY			
2	مرادميل	SPO.	ml ·	10-6-92	11	1,2	0	3 / N	amian	10	

I HEREBY CERTIFY THAT I AN QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

FOIL205671

-100668t

28192014



ROTH BROS. SMELTING CORP. CHAIN OF CUSTODY RECORD

SAMPI	E LOG	No.					SCRIPTION Ders Clo		ctuites	- 
SAMPI	ERS NA	ME:					DATI			
AMPLE No.	DATE	TIME	SAMPLE 10	CATION	GRAB	COMP.	SAMPLE : TYPE	No. OF CONTAINERS	REMARKS	
1	10-6-92		C-108		√.		wipe	(2)	Total PD	^ سىد
<u> </u>	10-6-92		C-109	,	$\triangle$		wipe	(a)		
<b>φ</b>			C-110		$\leq$		wipe	(3)		
1	a		C-111		$\checkmark$		wipe.	2		
8	<b>μ</b> 4		TRID WIL	oe 📗			wipe	(2)	$\downarrow$	
8 9	и		C-108			4	concrete.	(I)	TOLP COM	in
<del>2</del> 0	h		0-112			<b>√</b>	core	(1)		1
21	મ		C-112		$\checkmark$		wyje	(2)	48 hrs Tur	nai
<del>22</del>	11		C-113		,	V	core	13 705	160 hrs T	$\mathcal{M}^{\prime}$
33_			C-113		$\sqrt{}$	ļ	wyże	(2)	PCB_FCd, PC	
34	11 .	ļ	C-114		<u> </u>		wipe	(2)		
<u> </u>	11		C-115		<u> </u>	<u> </u>	wipe	10		]
36	1		C-116		<u> </u>	_	wipe	$\frac{1}{2}$	<u> </u>	1
							<u> </u>			
***										
				-		•	TOTAL:	23	<u> </u>	
				D.ITT						
	nshed by: Tarqaad	ı ` /\ `	Cours_	10692	1	E E	RECEIVED I	BY (SIGN) MAN S. B	101 46 2	20
RELINQU	ISHKD BY:	(SIGN)	<del>\</del>	DATE		TIM	RECEIVED 1	BY (SIGN)		7
•	house	•	<u>8</u>				3	· • • • • • • • • • • • • • • • • • • •		
		•					is sample was tak en):	,	· •	

:Page 2 of 2



# ROTH BROS. SMELTING CORP. 28192027-38 CHAIN OF CUSTODY RECORD

SAMP	_			CRIPTION		_ ` .	İ			
			, K	offu G	rc	开	ero (1	DOULL	_achvete	Æ
SAMPLERS NAME: Margaret Corregion DATE SAMPLED: 10/6/92										
SAMPLE No.	DATE	TIME	SAMPLE LOC	ATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	REMARKS	
27	10-6-92		C-117				core	4)	Franco, F	Þ)
7 8 8 8 8 8 8	10-6-92		C-118	.			core	(1)		
29	"		C-118		1		wipe	(D)	t-ca, fb	ţ
	, ,		C-119			$\vee$	<u>core</u>	1	(TOUP Ca,	P.Ł
31 37	"		C-120			V	core	<u> </u>		
37	١ ٧		C-120		_		wyse	(2)	(T-CA, PD)	ည်း
33	it		C-121			<b>V</b>	core		(True Can Pl	<b>)</b>
34	1,		C-122	•	/		wyse	(2)	(T-C4+PO)	2
沙	14		C-123		/		vipe	(2)		
36	٧		C-124		/	_	Wype			
3			C-125		/	<u>.</u>	wipe	3		
38	,,		C-126		V		wype	(a)	<u> </u>	
			·			<u> </u>	<u> </u>			]
			v			_		<u> </u>		1
	16 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			$\Phi_{ij}(t^{(i)})$			TOTAL	: 19		
=:				DATE	_				_;	-
•	RELINQUISHED BY: (SIGN)					TME	RECEIVED	BY (SIGN)	8:30pm :35ean'196/93	-
1 _/\	largare	<u> 1</u>	. Corrigan	10-6-9,	<del></del>			use S.Bri	:sean 96/93	
RELINQ	UISHED BY:	(SIGN)		DATE		TIME	RECEIVED :	BY (SIGN)		1
2			. :				3	· .	·	

I HEREBY CERTIFY THAT I AN QUALIFIED TO OBTAIN SAMPLES AND THAT THIS SAMPLE WAS TAKEN ACCORDING TO THE SAMPLING REQUIREMENTS SET FURTH IN 40 CFR 261 (SW - 846) (SIGN):

FOIL205673

78192027-

### Upstate Laboratories inc.

Shipping: 6034 Corporate Drive • East Syracuse, New York 13057 • (315) 437-0255 — Mailing: Box 289 • Syracuse, New York 13206 Southern Region (607) 724-0478 Western Region (716) 436-9070 Eastern Region (518) 459-3134

October 16, 1992

OCT 19 1992
HEADFINED YORK

Mr. John Menchella Roth Bros. Smelting Corp. 6223 Thompson Rd. E. Syracuse, NY 13057

Re: Analysis Report #101692025 - Roth Brothers Closure Activities

Dear Mr. Menchella:

Please find enclosed the results for your air samples which were received on October 5 and 6, 1992.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your sample.

Should you have any questions, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

Tinstay O'Rourke

Timothy M. O'Rourke

Industrial Hygienist

TMO/jd

Enclosures: report, invoice

cc/encs: N. Scala, ULI

file

∠ E. Henderson, H&A of New York (copy report)

Note: Faxed results were given to your office and E. Henderson, H&A of

New York on 10/7/92. TMO

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULI to be accurate and reliable for sample(s) tested. In accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.

DATE: 10/16/92

Upstate Laboratories, Inc. Analysis Results

Report Number: 101692025

Client I.D.: ROTH BROS. SMELTING CORP. ROTH BROTHERS

Sampled by: H&A OF NEW YORK

APPROVAL: QC:\_DC\_\_\_\_\_ Lab I.D.: 10170

CLOSURE ACTIVITIES PLANT 1 10/5/92 4H G

ULI I.D.: 27992190

Matrix: Air

PARAMETERS

RESULTS

KEY

Lead

<7ug/m3

All results are on an as rec.d basis unless otherwise stated.

DATE: 10/16/92

Upstate Laboratories, Inc.

Analysis Results

Report Number: 101692025

Client I.D.: ROTH BROS. SMELTING CORP. ROTH BROTHERS

Sampled by: H&A OF NEW YORK

APPROVAL: 61 QC: DC Lab I.D.: 10170

CLOSURE ACTIVITIES PLANT 2 AREA A 10/6/92 4H C

ULI I.D.: 28092068

Matrix: Air

PARAMETERS

RESULTS

KEY

Lead

30ug/m3

All results are on an as rec.d basis unless otherwise stated.

### KEY PAGE

- 1 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS
- 2 MATRIX INTERPERENCE
- 3 PRESENT IN BLANK
- 4 INSUFFICIENT SAMPLE
- 5 SAMPLE DILUTED
- 6 BLANK CORRECTED
- 7 HEAD SPACE PRESENT IN SAMPLE
- 8 BDL(BELOW DETECTION LIMITS)
- 9 . MDL(METHOD DETECTION LIMITS)
- 10 ADL(AVERAGE DETECTION LIMITS)
- 11 POL(PRACTICAL QUANTITATION LIMIT)
- 12 SAMPLE ANALYZED OVER HOLDING TIME
- 13 DISSOLVED VALUE MAY BE HIGHER THAN TOTAL DUE TO CONTAMINATION FROM THE FILTERING PROCEDURE OR VALUES WITHIN EXPERIMENTAL ERROR
- 14 MG/L / PPB
- 15 MG/L(MILLIGRAMS PER LITER), PPM(PARTS PER MILLION)
- 16 UG/L(MICROGRAMS PER LITER), PPB(PARTS PER BILLION)
- 17 PARAMETER NOT ANALYZED WITHIN 15 MINUTES OF SAMPLING
- 18 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/TOTAL XYLENES INCLUDE O, M, AND P
- 19 CALCULATION BASED ON DRY WEIGHT
- 20 SAMPLE DILUTED/TOTAL XYLENES INCLUDE O, M. AND P
- 21 TOTAL XYLENES INCLUDE O, M, AND P/NON-POTABLE WATER SOURCE
- 22 MG/KG AS REC.D / MG/KG DRY WT
- 23 INSUFFICIENT SAMPLE PRECLUDES LOWER DETECTION LIMITS
- 24 SAMPLE DILUTED/BLANK CORRECTED
- 25 ND (NON-DETECTED)
- 26 MATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS/BLANK CORRECTED
- 27 SPIKE RECOVERY ABNORMALLY HIGH/LOW DUE TO MATRIX INTERFERENCE
- 28 FIELD PARAMETER TO BE PROVIDED ON DISC
- 29 TOTAL XYLENES INCLUDE O, M, AND P
- 30 METHOD PERFORMANCE STUDY HAS NOT BEEN COMPLETED/ND(NON-DETECTED)
- 31 FIELD MEASURED PARAMETER TAKEN BY CLIENT
- 32 SAMPLE WEATHERED
- 33 NON-POTABLE WATER SOURCE
- 34 INDIVIDUAL AROCLORS DO NOT CARRY A DETECTION LIMIT BUT ARE INCLUSIVE TO THE TOTAL PCB CONTENT
- 35 TOTAL XYLENES INCLUDE O, M, AND P/NON-POTABLE WATER SOURCE/SAMPLE DILUTED
- 36 MATRIX INTERFERENCE CAUSING SPIKES TO RESULT IN LESS THAN 50.0% RECOVERY
- 37 MG/L / LBS PER DAY
- 38 MG/LCL2 / LBS PER DAY
- 39 UG/L / LBS PER DAY
- 40 MG/L LAS / LBS/DAY



ROTH BROS. SMELTING CORP. 1992/83-190 CHAIN OF CUSTODY RECORD, 10/1 have

SAMPI		oth Brothers Closure Activities								
SAMPI	ERS NA	ME:	<u>Nargaret</u>						10/5/92	
SAMPLE No.	DATE	TIME	SAMPLE L		GRAB	COMP.	SAMPLE TYPE	, No. OF CONTAINERS	analysis REMARKS	
183	10-5-92	•	C-101		1		wipe	(2)	Total (Cd)	
184	10-5-92	:	C-103		V		wipe	(2)	li .	
185	10-5-92		C-104		<u>/</u>		wipe	<u> </u>	11	
186 .	10-5-92		C-105		V		wipe	2	VI.	
187	10-5-92		C-106		/		wipe	(23)	i j	
188	10-5-92	·	C-107	····	1		wipe	<b>D</b>	<b>\$1</b>	
189			Trip 1	<u> Jipe</u>				(2)	·	
			C		_					
		Uhaa		·			carmida		NIOSH ME	
190	10-5-92	4 hrs	Plant 1	·	/		Sample	(1)	7082 for	
			·		ļ					
				•		_				
					<u> </u>	<b> </b> _				
	<u> </u>			<del></del>	ļ					
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· ·		Para -		CALL CONTRACT	<del>.</del>		TOTAL			
			<u> </u>	Dame		43.05	<u> </u>	- ()		
RELINQUISHED BY: (SIGN)				DATE TIME RECEIVED BY (SIGN)						
1 Margaret J. Carron				10-5-92						
RELINQUISHED BY: (SIGN)				DATE		TIME RECEIVED BY (SIGN)				
2 3							·			
i hereby ( requirene	CERTIFY TH NTS SET FU	ATIAN QU RTHIN 44	NLIFIED TO USTA	in saples an (SW :- : 8	Ū π√ 46)	HT. TH SIC)	is saiple vas takd in):	N ACCORDING TO	THE SAMPLING	

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FOIL205678

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# ROTH BROS. SMELTING CORP. 10/7 have CHAIN OF CUSTODY RECORD

SAMPLE LOG No.	PROJECT NAME & DESCRIPTION							
	Roth Brothers Closure Activities							
SAMPLERS NAME: Ma	<u>rgaret J. C</u>	ORLI	ga/	<u>DATE</u>	SAMPLED:	10/6/92		
SAMPLE DATE TIME	SAMPLE LOCATION	GRAB	COMP.	SAMPLE TYPE	No. OF CONTAINERS	remarks (Û		
10-6-92 4 hrs P	lant 2 Area A	-	/	Contridge Samples.	(1)	NI 054 Meth 7082 for L		
				·				
			_					
		-	$\uparrow$					
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	<u> </u>				<u> </u>			
		_	.	TOTAL:				
			•		1			
RELINQUISHED BY: (SIGN)  1 Maranel O. C.	DATE  10-6-90		TIME RECEIVED BY (SIGN)					
RELINQUISHED BY: (SIGN)	DATE		IMR	RECKIVED BY	(SIGN)			
2 Willent h ba	10/0/92	1/5	<i>30</i>	3 Bl.	mi a	no e		

REQUIREMENTS SET FURTH IN 40 CFR 261 (SW - 846) (SIGN):

FOII 205679

### Uustate oratories inc.

Shipping: 6034 Corporate Drive • East Syracuse, New York 13057 • (315) 437-0255 \_\_ Mailing: Box 289 • Syracuse, New York 13206 Southern Region (607) 724-0478 Western Region (716) 436-9070 Eastern Region (518) 459-3134

October 28, 1992

Mr. John Menchella Roth Bros. Smelting Corp. 6223 Thompson Rd. E. Syracuse, NY 13057

Analysis Report #102892001 - Closure Activities-Roth Bros

Dear Mr. Menchella:

Please find enclosed the results for your samples which were received on October 15, 1992.

We have included the Chain of Custody Record as part of your report. You may need to reference this form for a more detailed explanation of your sample.

Should you have any questions, please feel free to give us a call.

Thank you for your patronage.

Sincerely,

UPSTATE LABORATORIES, INC.

Centhery of Scalar Anthony J. Scala

Director

AJS/lw

Enclosures: report, invoice

cc/encs: N. Scala, ULI

file

✓ E. Henderson, H&A of New York (copy report)

Faxed results were given to your office and E. Henderson, H&A of

New York on 10/20/92. AJS

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULI to be accurate and reliable for sample(s) tested. In accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.

DATE: 10/28/92

Upstate Laboratories, Inc.

Analysis Results

Report Number: 102892001

TCLP Lead

lient I.D.: ROTH BROS. SHELTING CORP.

Lab [ .D.: 10170 Sampled by: H & A OF NEW YORK

ID: 28992031 Mat: Solid CLOSURE ACTIVITIES-ROTH BROS C-127 10/15/92 PARAMETERS RESULTS KEY -----TCLP Lead 18mg/l ID:28992032 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-128 10/15/92 PARAMETERS RESULTS KEY TCLP Lead 23mg/l D:28992033 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-129 10/15/92 **PARAMETERS** RESULTS KEY -----\_\_\_\_\_ TCLP Lead 3.6 mg/lD:28992034 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-130 10/15/92 PARAMETERS RESULTS KEY -----------\_\_\_ TCLP Lead 42mg/l D:28992035 Mat:Solid CLOSURE ACTIVITIES-ROTH BROS C-131 10/15/92 PARAMETERS RESULTS KEY ----------\_\_\_

4.0 mg/1

Ill results are on an as rec.d basis unless otherwise stated.

### KEY PAGE

- HATRIX INTERFERENCE PRECLUDES LOWER DETECTION LIMITS
- 2 MATRIX INTERFERENCE
- 3 PRESENT IN BLANK
- 4 INSUFFICIENT SAMPLE
- 5 SAMPLE DILUTED
- 6 BLANK CORRECTED
- 7 HEAD SPACE PRESENT IN SAMPLE
- 8 BDL(BELOW DETECTION LIMITS)
- 9 MDL(METHOD DETECTION LIMITS)
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- 37 MG/L / LBS PER DAY
- 38 HG/LCL2 / LBS PER DAY
- 39 UG/L / LBS PER DAY
- 40 HG/L LAS / LBS/DAY



# ROTH BROS. SMELTING CORP. 10/15/hard. CHAIN OF CUSTODY RECORD

SAMPI.	PROJE	CT NAME & DESCRIPTION SOL LIOSURE ACTIVITIES - ROTH Bros								
SAMPLERS NAME: Margaret Corrigon DATE SAMPLED:									10/15/	92
SAMPLE No.	DATE	TIME	SAMPLE LO	CATION	CRAB COMP.		SAMPLE TYPE	No. OF CONTAINERS	REMARK	S
	10-15		C-127			1	Asphal+		TOP	Ph
<i>'</i> >	10-15		C-128			<b>4</b>	Asphalt.		TCLP	Pb
33	10-15		C-129				Asphal+		TCLP	Pb.
4	10-15		C-130	· <u>- · · · · · · · · · · · · · · · · · ·</u>			Asphalt	<u>(12</u>	TCLP	Pb
5	10-15	-	C-131	·			rsphalt		TCLP	Ph!
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REQUIREMENTS SET FORTH IN 40 CFR 261 (SW - 846) (SIGN):

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Appendix E

### APPENDIX E

Photographic Documentation





Photograph 1: View of Hazardous Waste Management Unit (HWMU) Plant 1 looking at east wall of room from NW doorway, prior to cleaning. Note black surface grime and dust along wall and floor prior to cleaning.



Photograph 2: View of HWMU Plant 1, after cleaning. Note the removal of black grime and dust from floor and east wall.



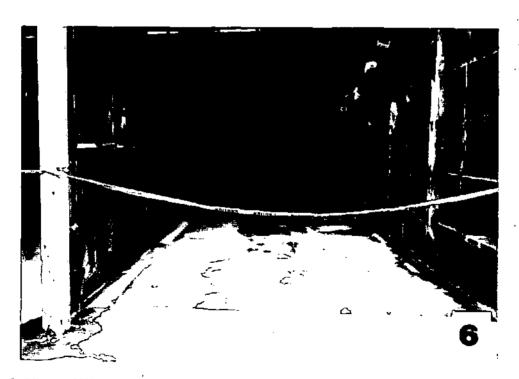
Photograph 3: View of HWMU Plant 2, Area A looking at south wall from the east side of the building, prior to cleaning. Note dust along floor and ledges of wall.



Photograph 4: View of HWMU Plant 2, Area A looking at SW corner of building from the east side of the building, after cleaning. Note removal of dust from floor, ledges and walls.

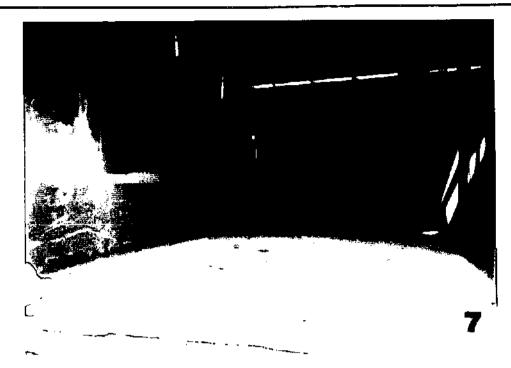


Photograph 5: View of HWMU Plant 2, Area A looking at north wall of building, prior to cleaning. Note accumulation of dust along ledge and floor.

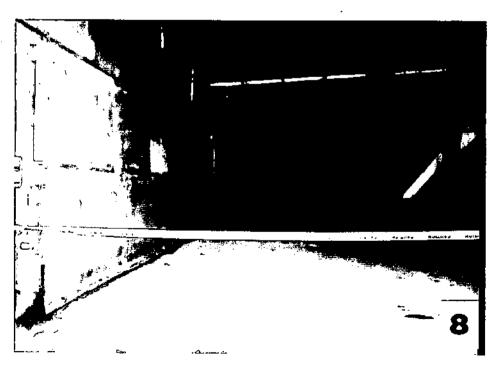


Photograph 6: View of HWMU Plant 2, Area A looking at west wall of building, after cleaning.

Note removal of dust from floor, walls and ledges.



Photograph 7: View of HWMU Plant 2, Area B looking at west wall of building, prior to cleaning. Note accumulation of dust on floor and walls.

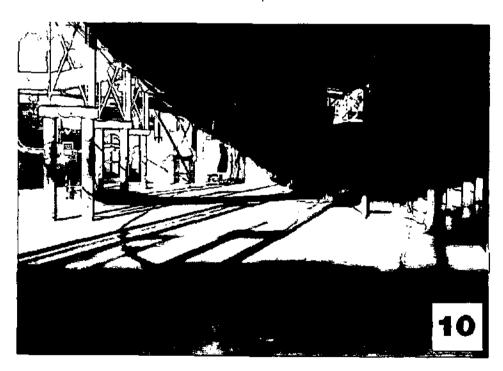


Photograph 8: View of HWMU Plant 2, Area B looking at west wall of building, after cleaning.

Note removal of dust from floor and walls.



Photograph 9: View of HWMU Plant 2, Area C, looking at north wall, after cleaning.



Photograph 10: View of HWMU Plant 2, Area C looking at west wall, after cleaning.

